

1 UNITED STATES OF AMERICA
2 NUCLEAR REGULATORY COMMISSION

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4 MEETING

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6
7 U.S. NRC
8 11555 Rockville Pike
9 Rockville, MD

10
11 Tuesday, November 2, 1999
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14 The above-entitled meeting commenced, pursuant to
15 notice, at 9:05 a.m.
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P R O C E E D I N G S

[9:05 a.m.]

MR. BLOOM: Good morning. I'm Steven Bloom.
Thank you for coming. We'll go around the room and do
introductions.

MR. DEMBECK: Good morning. I'm Steve Dembeck.
I'm the section chief in charge of vendors and owner group
issues.

MR. SHERON: I'm Brian Sheron, Associate Director
for Project Licensing and Technical Assessment.

MR. SAM COLLINS: Sam Collins, Director, NRR.

MR. RICHARDS: Stuart Richards, on PDIV.

MR. WALSH: Larry Walsh. I work for North
Atlantic Energy Service Company and I'm the Vice Chairman of
WOG.

MR. BAILEY: Jack Bailey, TVA. I'm the Chairman
of the Executive Advisory Committee and Executive Management
Group for WOG.

MR. LIBERATORI: I'm Lou Liberatori, Consolidated
Edison and Chairman of the Westinghouse Owners Group.

MR. TIM COLLINS: I'm Tim Collins, the Deputy
Director of Division of Systems and Safety Analysis.

MR. ELLIOTT: I'm Rob Elliott in the Plant Systems
Branch.

MR. WOHL: Millard Wohl, TRA Branch, NRR.

MR. RUBIN: Mark Rubin, section chief in the PRA
branch.

MR. BINGER: Sam Binger, Westinghouse, the WOG
Project Office.

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1 MR. LOUNSBURY: David Lounsbury, PSEG Nuclear, WOG
2 Operations Subcommittee.

3 MS. COLLINS: Leslie Collins, ABB.

4 MR. CUSHING: Jack Cushing, project manager.

5 MR. SATYAN-SHARMA: T. Satyan-Sharma from AEP,
6 Chairman of the Subcommittee.

7 MS. CONE: Christine Cone, McGraw-Hill.

8 MR. JACOBS: Karl Jacobs, New York Power
9 Authority, Chairman of Equipment Engineering.

10 MR. DRAKE: Andy Drake, Westinghouse. I'm the
11 Westinghouse project manager.

12 MR. NEWTON: Roger Newton from Wisconsin Electric
13 Power. I'm the WOG Chairman.

14 MR. BLOOM: Okay. Thank you, very much for
15 coming. In further introduction, Sam, do you have a couple
16 of words you would like to say?

17 MR. SAM COLLINS: Yeah. Thanks, Steven. I think
18 we should all identify ourselves before we speak, perhaps,
19 for the purpose of the record. We are transcribing the
20 meeting, because of late noticing and we apologize for that.
21 Essentially, we made a mistake. We intend to keep all of
22 our stakeholders informed of these types of meetings. In
23 this case, we didn't achieve that, so we are providing a
24 transcript for the record. That shouldn't inhibit free flow
25 of information. I think we've been frank in the past and
our discussions have benefited from that, so I look forward
to continuing that.

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We have a copy of the draft agenda. We appreciate
you providing that to us. I believe we have individuals

1 available to respond to those topics. If not, certainly, we
2 will take away any IOUs. We'll review those at the end of
3 the meeting and make sure that we provide those not only to
4 the individuals present today, but, also, for the record.

5 These meetings, I think, are very beneficial for
6 us. They are a kind of unique forum and they're certainly
7 not unique to Westinghouse. We, also, meet with GE and CE
8 and B&W. But, they do have the opportunity, I believe, to
9 focus the staff not only on where the industry is coming
10 from as an entity with some commonality of vendor types,
11 but, also, provide feedback to us on how the staff is doing
12 in performing in those areas.

13 An important aspect of this is the look-forward
14 aspect of what's coming in the future that we need to be
15 able to anticipate, as far as staff resources, our concern,
16 and schedules. I think we have some lessons learned in
17 those areas. As a learning organization, NRR will take
18 those from our stakeholders and provide for lessons learned
19 and move forward.

20 As an organization, we are focusing in three
21 arenas right now organizationally. We're focusing on our
22 planning and budgeting process, which we hold ourselves
23 accountable not only for the products, but for the effort
24 for those products, and I think this couple of topic items
25 speaks to that today in measuring those deliverables. And
we've talked about those in terms of topical reports in the
past or licensing amendments or other product lines.

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 We're getting a little more sophisticated in
there. Our operating plan is out in draft form. After the

1 first quarter of this year, we'll be populating that
2 operating plan with the measurables for the first year --
3 first quarter of this year, rather, and that will become the
4 pilot for the agency. We'll transfer that operating plan
5 knowledge to the other aspects of the agency and throughout
6 the remainder of this year, with the goal of the first part
7 of fiscal year 2001, for each aspect of the NRC to have an
8 operating plan using the NRR operating plan as a template.

9 That's important, because, in order for us to
10 perform our job in NRR, we have other stakeholders, and our
11 operating plan and our performance plan cuts across
12 organizational lines. Decommissioning will be an example of
13 that. The program lead for decommissioning is with John
14 Greeves in NMSS. Stu has the lead NRR, as far as the Part
15 50 licenses are concerned. But, we're operating more in
16 arenas now; so in that decommissioning arena, it's incumbent
17 on Stu and Stu's staff to coordinate with the -- ultimately
18 with the arena manager, who is John Greeves, to be sure that
19 the agency is cohesive and understandable in that area.

20 How does that affect yourselves? Well, when we
21 start talking about what it takes to get work done, we
22 essentially plan our product lines and then we measure
23 those, and we want all of our stakeholders to be involved in
24 that. And the earlier we can plan and the more we agree on
25 what the measurables are and what the agreement of success
is, then the better off we are, as an organization.

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The second area we're operating in right now is
internal and that is organizational and individual
effectiveness. And we operate essentially with a

1 four-by-four matrix that shows various levels of performance
2 and various areas that we measure. One of the key focuses
3 we have right now, which you may find interesting, if not
4 amusing, is that we -- our work planning center. Quite a
5 few of our resources right now are focused on the startup of
6 a work planning center, where we have gone back and mapped
7 out our processes, identified those product lines, mapped
8 out the variables, what we need for procedures, and we're
9 going through those processes.

10 That will include topical report reviews,
11 amendment reviews, coordinating with research, who is
12 another one of our stakeholders, as necessary for us to get
13 our work done on confirmatory research. It's going to
14 include a corrective action program, for example, which I
15 know the industry is very interested in the NRC's view
16 towards an internal corrective action program. And we're
17 looking right now on whether it should include an employee
18 concerns program. So, that's a little bit of a vision, but
19 the flavor is that we're looking for our organization to
20 become much more accountable and much more disciplined in
21 how and when we do our work and to be responsive to those
22 external influences.

23 The third area that I mentioned just briefly is a
24 leadership model and people like Brian is an associate
25 director. John Johnson, who is coming in to replace Bill
Kane, will be key in defining this leadership model that we
have and moving it forward. And we have Arthur Andersen
helping us in that arena.

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Organizationally, we're continuing to refine the

1 organization. As I mentioned, Bill Kane has gone over to
2 take over the nuclear materials area. John Johnson, who is
3 the Deputy Regional Administrator from Region II, will be
4 coming in to take over Bill's slot, as the Associate
5 Director for Inspection and Programs. That's a key area for
6 us, as far as liaison with the regions is concerned.

7 John has worked in Region I and Region II. He's
8 an Annapolis graduate. He has a graduate degree in nuclear
9 engineering from UVA. He has his Navy nuclear experience,
10 but he's, also, been a senior resident inspector. He was at
11 Pilgrim, for example, senior resident. He's worked in the
12 DRS organization in the regions, in the engineering and the
13 DRP and was Deputy Region Administrator. So, he brings
14 those attributes in to the product lines that deal with the
15 oversight process, definition of the security program,
16 operating licensing, 50.59 maintenance rule -- all of those
17 activities of that response in that review, all those areas
18 that are underneath the Associate Director for Inspection
19 and Programs.

20 We're, also, continuing to look at license
21 renewal. I know that's a topic area, as far as today. You
22 know we have five units in there. For example, we have 80
23 some odd percent of the industry who has expressed some type
24 of interest in license renewal. We view, as we map this out
25 in the future, that we may have upwards of 12 units at any
time in the pipeline going through license renewal. So, we
have a challenge, which is really an industrial engineering
challenge for us, to break up this process into different
product lines and be able to coordinate those, so we can

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1 keep the process moving in the future.

2 Our budget right now calls for four units to come
3 in this year, four units to come in next year. We should
4 complete Calvert Cliff's and Oconee this year. That's our
5 goal. So, I think as far as looking for attentions in our
6 organization for where our resources are going in the
7 future, there's two main influences. One is we're not
8 seeing the amount of plants, perhaps, that we had budgeted
9 or anticipated in decommissioning. What's the reason for
10 that? Well, deregulation and these plants being looked at
11 favorably for being purchased. Oyster Creek is a good
12 example of that and Oyster Creek was on our radar screen
13 potentially as a plant for decommissioning. Now, it's on
14 our radar screen as a plant potentially for license renewal.

15 The resources are very different. The resources
16 in decommissioning are two to three resources, perhaps, for
17 the first year, which is similar to an operating unit; but,
18 then, it tails off. Resources for license renewal are about
19 22 FTE and a good number of hundreds of thousands of
20 dollars. It's a way of getting them refined in those areas.
21 But, clearly, we have product shifts and those product
22 shifts will drive our resources and we'll have to sustain
23 communication with you folks to be sure that that's clear in
24 where we are with expectations.

25 Now, we have the new Chairman. Dr. Meserve --
Cameron Meserve was officially on board last week. He's
already very involved in the staff product lines. We're
briefing him on decommissioning. We're briefing him on the
maintenance rule. I noticed over the weekend, he's signing

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1 operator licenses already. So, he's engaged. And we're in
2 the transition now with his staff. He has a temporary staff
3 for 90 to 120 days during the transition; then there will be
4 a number of individuals who are selected for permanent staff
5 members. That's always a little bit of an unknown for us,
6 because, clearly, the Chairman deserves and seeks key
7 members of the staff to help his staff. So, we'll roll with
8 that for the next 90 to 120 days and then solidify that
9 staff and then refine the organization.

10 That's a little bit of a capsule. We have a
11 number of deliverables, I think, that we're going to talk
12 about today for yourselves; but, I'm sure those that are on
13 your radar screen, as far as 50.59 and maintenance rule and
14 those types of products that are being applied.

15 A big milestone for us will be the oversight
16 process at the end of this year, rolling that out for the
17 remainder of the plants. We have meetings coming up with
18 INPO this week and NEI next week, annual meetings. And the
19 Commission, typically, reserves this part of the year and
20 the first part of next year to focus on areas that the
21 Commission believes is important on the staff's schedule.

22 So, I would ask you to follow the tasking memo --
23 Chairman's tasking memo. We put out that periodically. We
24 have the report we send down to Congress. That's addressed
25 to Senator Domenici and other stakeholders. Those focus on
key areas. And then, we, also, have the reactor water -- or
reactor -- regulatory information conference. The reactor
water safety conference was last week. The regulatory
information conference is coming up and we'll be looking for

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1 input into the agenda. We should be having that up on the
2 Web very soon, soliciting agenda topics. We'll be looking
3 for industry and certainly the Owners Group participation to
4 help define those products. And we hope to have, as we're
5 gravitating towards each year, a much more interactive
6 session, where we have less presentations, if you will, and
7 more discussions on topics. And in order to do that
8 effectively, we need to have key stakeholders involved in
9 that, not only the industry, but -- industry groups, but
10 certainly generators, as well as other stakeholders. So,
11 we'll be soliciting that.

12 So, with that, you know, we can go into the
13 meeting. Jack, I think, you're going to lead us in that.
14 But, are there any specific topics, Larry, that you or Lou
15 want to bring up before we start?

16 MR. WALSH: No.

17 MR. SAM COLLINS: Lou is going to have ample
18 opportunity to talk here. Steve, did you -- Steve?

19 MR. BLOOM: Back up to them and let them start the
20 meeting. All right.

21 MR. BAILEY: Jack Bailey speaking now. First of
22 all, I echo your comments on the importance of this meeting
23 from our perspective. We've been doing this now for seven
24 years. But, the WOG, itself, has changed fairly
25 significantly over that amount of time, in some respects,
particularly the last two years. And for example, about two
years ago, we told you we tried to go through a strategic
planning process with the WOG in a previous meeting and
align some of what it's doing with what the industry changes

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1 are requiring it to do, and one of the big things we had
2 done about a year ago is establish an executive management
3 group that works more closely with the steering committee of
4 the WOG.

5 In past years, the steering committee, and even
6 currently today, pretty much drives the day-to-day
7 operations of the WOG, but they look for valuable input, in
8 terms of what they need to be looking forward to in the
9 future, for both its members and to interact with the
10 regulator. The executive management helps them do that;
11 but, I think this meeting and this forum is another valuable
12 input from our perspective. We do it twice a year and even
13 though we have a lot of ideas on how we might drive forward
14 some of the issues we're dealing with, often the input we
15 get in this meeting helps set that direction for us. So, I
16 put it on the table, as we start the meeting, because we
17 need those kind of comments and that kind of insight
18 sometimes from your perspective, too, just as you need it
19 from ours, from what we're doing.

20 The executive management group is a small subset
21 of the overall executive advisory committee and we take that
22 input and talk about it, in terms of giving direction to the
23 steering committee, too, to help them determine what they
24 need to do. We try to pick items of importance that are on
25 the agenda; but, if there are other things on your list,
too, that you think need to be talked about, then feel free
to bring those up at any time during the meeting.

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Lou is going to take the lead on doing the
presentation and if we need other people to contribute,

1 also, at some point, we'll just challenge them to come on in
2 and add to it. So, let's get to it.

3 MR. SAM COLLINS: Okay.

4 MR. LIBERATORI: Good morning, Lou Liberatori.

5 MR. SAM COLLINS: Put that on your tie.

6 [Laughter.]

7 MR. LIBERATORI: Good morning. I'm Lou
8 Liberatori, Chairman of the Westinghouse Owners Group. I'd
9 like to open by quickly going through our proposed agenda
10 for this morning and briefly go over the organizational
11 structure of the WOG, which hasn't changed very much since
12 the last time we met. But, basically, Jack has already made
13 an introduction.

14 This is the agenda. We've selected the following
15 items for presentation this morning: where we are with
16 respect for our program to redefine a large break LOCA; to
17 talk a little bit about containment sump issues; where we
18 are in the baffle barrel bolting program; the GSI-23
19 closure; where we're headed with respect to license renewal;
20 I'd like to talk a little bit about a NUPIC audit we had at
21 Westinghouse, which was sort of our follow-up to some of the
22 issues that came out of your audit with the Siemens analysis
23 last time; and talk a little bit about some of the requests
24 that you've asked us to do, with respect to reviewing draft
25 reports that become available to you. We'll go through our
normal listing of where we think we are in the WOG topicals
that have been submitted, as well as what we anticipate over
the next year, year-and-a-half. And I'm going to have some
open discussion and closure of the meeting.

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1 So, as far as availability, is there any order?
2 Does anyone have to leave? We can be flexible of how we
3 present these. Otherwise, I propose we just go down the
4 list.

5 MR. SAM COLLINS: I think we are prepared of the
6 order suggested, right?

7 MR. BLOOM: Yes, sir.

8 MR. LIBERATORI: This is what WOG steering
9 committee structure. It's basically been this way for a
10 number of years now. We have a chairman, a vice chairman,
11 an RRG chairman, who are all here in attendance today. The
12 basic structure has five subcommittees, along with a couple
13 of special working groups that deal with the baffle barrel
14 bolting and license renewal, both of which, at the current
15 time, report directly to the steering committee, rather than
16 the subcommittee. And I'll be talking a little bit about
17 that later on, when we get to the presentation on those
18 matters.

19 We do have our annual elections in February. So
20 the next time we come in here, there will be a significant
21 number of changes on this chart.

22 MR. SAM COLLINS: Are you running?

23 MR. LIBERATORI: I'll be stepping down. And so,
24 there will be elections for a lot of these positions, and
25 four of the five subcommittee chairmen will, also, be
 changing this time around. So --

 MR. SAM COLLINS: How does that work? Will you --
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L | is there a motivation to keep people moving through or is it

1 --

2 MR. LIBERATORI: We have annual elections, but the
3 expectation is that everyone serves a two-year term. And
4 there have been three-year terms, primarily due to either a
5 vice chairman not being able to take over or a slot being
6 open and so forth. So, we tend to fill in as we need to.
7 But, typically, it's a two-year term.

8 MR. BAILEY: Jack Bailey. The real motivation is
9 these folks put in 50 to 60 percent of the time, probably,
10 just in WOG activities. So, any utility that sacrifices a
11 valuable resource like that, they kind of want them back, at
12 some point. So, it's a matter of sharing the load between
13 the utilities.

14 MR. SAM COLLINS: Okay.

15 MR. LIBERATORI: The next slide I have contains
16 basically the open items from our April meeting. I just
17 wanted to touch briefly on them and how we close them or at
18 least addressing them.

19 The first one was a top nozzle, which was a fast
20 breaking issue, at the time we met in April, and the
21 Westinghouse fuels people did come in here in May and have a
22 meeting on that issue. And as far as the WOG is concerned,
23 we have -- as a WOG, we have no active program with respect
24 to the nozzle screw issue. Westinghouse is handling that as
25 a fuel issue directly with the fuel people at the utilities.
We do have our fuel working group chairman following the
issue, working with Westinghouse, so that we do have an
avenue for information. But, at this point, it appears to
be handled within the fuel division of Westinghouse. We see

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1 no need for the WOG to interject itself. And people are
2 preparing, as they get into the fall outages, in the event
3 that something occurs, so they are continuously planning
4 this in place at the utilities.

5 The status of redefinition of the large break
6 LOCA, I have separate slides on that. I'll be covering
7 that. When we met back in April, we were still looking for
8 some lead plants to step up as reference plants. Comanche
9 Peak and D.C. Cook were the Westinghouse plants that have
10 since stepped up. This gives us both an ice condenser, as
11 well as a large dry, so we feel that they were good choices
12 and they should help the overall program.

13 MR. SAM COLLINS: That is commendable of D.C. Cook
14 -- they have a lot on their plate right now -- to do that.

15 SPEAKER: Thanks a lot.

16 MR. LIBERATORI: PASS elimination, I don't have
17 any slides to cover this today, but it was becoming active
18 when we met in April. There's been a lot of activity over
19 the last six months on that. So, we have been working with
20 staff and we've made presentations at ACRS. So that program
21 is moving along and, at this point, we're ultimately
22 satisfied. We've gotten one SER on the core damage
23 assessment and hopefully won't be much longer before the
24 second one is out.

25 MR. SAM COLLINS: You're following the ACRS --

MR. LIBERATORI: Yes.

MR. SAM COLLINS: -- committee comments on that?

MR. LIBERATORI: Yes.

MR. SHERON: Now, your proposal was not to

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1 eliminate PASS completely, if I remember.

2 MR. LIBERATORI: To maintain some capability for
3 sampling.

4 MR. SHERON: Which is different from the --

5 MR. LIBERATORI: Which is different from
6 combustion and we're working to resolve this.

7 MR. SHERON: Okay, and you know we went out with a
8 Federal Register notice, looking for comment -- or, at
9 least, I think it's somewhere in the printouts -- it's in
10 the process of going out to basically solicit stakeholder
11 comment on the elimination of PASS, primarily from the
12 states.

13 MR. LIBERATORI: In the emergency planning
14 perspective.

15 MR. SHERON: Right.

16 MR. LIBERATORI: So, we're active and we're
17 following that.

18 We've discussed the effort we had ongoing to do
19 PSA certification among our members and you had suggested
20 that we get in touch with ASME. We did that; not only did
21 we do that, we actually have a WOG representative on the
22 project team now. He's involved in some of the standard
23 writing. So, we're intimately involved in that effort now.

24 MR. SAM COLLINS: How much of a separate effort
25 are you driving right now, Lou, as opposed to the ASME
committee? I mean, are you working in parallel with them
now or --

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MR. LIBERATORI: Yes, we're working parallel.
We've had an effort to, over the period of about three years

1 or so, to do all of our members PSAs. We've completed --
2 correct me if I'm wrong, I think we've done three so far.
3 And we're continuing the process, maybe at a little bit of a
4 slower pace, but we feel it is helping in parallel, because
5 we're -- as we're doing that, we're learning and are able to
6 bring that to the --

7 MR. SAM COLLINS: Okay.

8 MR. LIBERATORI: -- project team, as well. So,
9 we're factoring in some lessons learned, as we go. So, at
10 this point, we think we're okay. We're just not going as
11 fast as we had planned on our original project.

12 MR. SAM COLLINS: Right; okay. Thank you.

13 MR. LIBERATORI: As far as the AOV guidance
14 document, the joint Owners Group had been working on that
15 collectively. One document was prepared and finalized. And
16 the JOG and our executive committees decided to forward that
17 to NEI for disposition, with respect to the industry. NEI
18 looked at it and their selection was to forward it to INPO,
19 who subsequently issued it in the information exchange and
20 then, also, forwarded a copy to staff. We know that very
21 recently some comments were provided back to NEI by the
22 staff on that document and at this point, those comments
23 will be sent back to the joint core team, when they do meet.
24 I believe they're not scheduled to meet until after the
25 first of the year. But, at this point, they will be fed
back into that group for consideration.

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MR. SAM COLLINS: I think we got wrapped around
the axle a little bit on that with the comments. But, I
think it's straightened out now.

1 MR. BAILEY: That was the part about INPO being --

2 MR. SAM COLLINS: Exactly. Yeah, we need to be
3 careful that INPO and NEI are able to maintain their roles
4 and they're clearly very distinct roles, as opposed to NRC
5 with their regulatory stand. I mean, we're trying to --
6 Brian is working on this and it's not an easy issue, about
7 how to coordinate those three arenas, between NEI, INPO, and
8 NRC, to try not to be redundant or, in some cases, even
9 diverse in a way we approach some of these problems.

10 MR. WALSH: If you get a solution, let us know.

11 MR. SAM COLLINS: We're going to talk about it on
12 Thursday.

13 MR. LIBERATORI: But, it's a problem on our end,
14 too. The Owners Groups are moving into an area, where we
15 seem to be working more and more on joint topics and, you
16 know, this is a classic example of that. So, we meant this
17 as an acceptable way of addressing an AOV program, if the
18 utility felt it was in trouble and needed some help. And
19 that's why it came out as an information exchange item from
20 INPO.

21 MR. SAM COLLINS: This is an area that we might
22 want to just remain sensitive to, because in our trying to
23 resolve the issue, Larry, about how to handle these
24 generator communications or how to broker and take credit
25 for industry initiatives, the Owners Groups may have a role
in that. You know, as we continue down this path, we may
very well need to call other people to the table and try to
understand better how to do that effectively and
efficiently.

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1 MR. LIBERATORI: And we would be open, as well.
2 As I said, the efforts are -- our cooperation with each
3 other of involvement, as well.

4 MR. SAM COLLINS: I'm going to more actively meet
5 with INPO on Thursdays.

6 MR. LIBERATORI: The next item has to do with the
7 break opening time WCAP. The staff did issue an SCR, but
8 limited its application to strictly the baffle bolting issue
9 and our original request had been for a general approval of
10 that. And we resubmitted a request clarifying that. When
11 we met last time, we weren't quite sure, you know, where
12 that ended up. We have cleared that up in the meantime.
13 Andy, I believe, through Steve, has made some contacts. And
14 you do have the re-requested letter and we can talk about it
15 later. It's on the table of WCAP and is still outstanding.

16 MR. SAM COLLINS: We're going to come back to that
17 today, Lou?

18 MR. LIBERATORI: Yeah.

19 MR. SAM COLLINS: Okay.

20 MR. LIBERATORI: It's just that we didn't have an
21 answer when we met last time.

22 MR. BAILEY: Since we're not going to cover AOV as
23 part of the agenda, I think we need to go back and just put
24 something on the table, as part of this discussion. The
25 direction the industry is going right now is one where we
will have a program guidance that's out there, right now
issued through INPO as a guidance document. But, there is
not a move right now underfoot to have an industry
commitment to a program similar to like the steam generator

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1 program, for example, where NEI signed off on it.

2 So, in that respect, it will be a guidance
3 available to the industry to put a program in effect, but
4 there will be no requirement, at this point, for them to
5 have to follow that, unless they have a problem with AOVs
6 and they deal with it. So, I don't know if that creates a
7 problem for you, but I just wanted to make sure that was
8 clear, that that's where they think they're going -- or
9 where the industry thinks it's going right now.

10 MR. SHERON: I don't know -- he just went to seek
11 to get engineering here.

12 MR. SAM COLLINS: Okay.

13 MR. SHERON: We may want to come back to that.
14 I'm trying to get our engineering folks here.

15 MR. LIBERATORI: At the last meeting, we talked a
16 lot about reactor coolant pump seals and that the closure
17 for GSI-23 was going to become very active, which it did.
18 And we participated in a number of meetings since last
19 April. We, also, made a presentation at ACRS just on
20 October 1st. I do have a slide on that later; but, clearly,
21 we've engaged with respect to the closure of that issue.

22 And the last item here was whether or not we, as a
23 WOG, were going to comment on the proposed changes to
24 50.55a, specifically with respect to elimination of the
25 10-year update. And as a WOG, we determined not to comment,
strictly based on the diverse opinions within the Owners
Group; it was difficult to come to one consensus. However,
we did encourage our members, from their own perspectives,
to provide comments either directly or through NEI.

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1 MR. SHERON: Do you have diverse perspectives on
2 that issue?

3 MR. LIBERATORI: Yeah.

4 MR. SHERON: I mean, I remember when the industry
5 comments came in and I think they were all like rubber-stamp
6 letters. I'm just -- I was curious why you have diverse
7 comments. But, that's okay; you don't have to get into it.

8 MR. SAM COLLINS: Lou, are you following ACRS
9 comments under closure or GSI-23? Are you familiar with --

10 MR. LIBERATORI: Yes, we have -- in fact, Dave was
11 the one who made a presentation at ACRS and he's been close
12 --

13 MR. SAM COLLINS: Okay. So, you have seen the
14 questions potential of how many plants have the upgraded
15 seals. Is there -- is it appropriate for the staff to do a
16 study, you know, to determine potential or should we look at
17 other seals and those types of things?

18 MR. LOUNSBURY: Dave Lounsbury. My personal
19 opinion on that is it's a misconception with the high
20 temperature old rings. They're definitely improved; they're
21 definitely better; however, the old rings are still
22 functioning. And all the plants that have been out there
23 are moving to SPO criteria, that they're currently licensed
24 to, have had to prove that the old style old rings were
25 still adequate through safety especially applied to the
coking. But, there was the slight misconception that with
the ACRS, in my opinion, that they have this new and latest
and greatest, you know, design, why isn't everybody jumping
on it. But, when you look at the cost of putting that in

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1 and the ALARA consideration and all these other things, if
2 what you have is adequate, why incur the extra cost.

3 MR. LIBERATORI: A number of people had them in
4 stock that they were using and other people, as they were
5 doing normal RCP maintenance, are phasing over to the new
6 high temperature old rings. There are some utilities that
7 have high temperature old rings on sump pumps and not on
8 others, so they're handling them in the normal scheduling of
9 maintenance, as opposed to a speeded up back fitter sorts.

10 MR. SAM COLLINS: Okay; thank you.

11 MR. LIBERATORI: Redefinition of large break LOCA
12 design basis: back in September, 1998, Commissioner Diaz
13 requested all of the Owners Group to identify their highest
14 priority regulatory issue, and the one we selected at that
15 time was to open a consideration for eliminating the current
16 large break LOCA requirements. Collectively as an Owners
17 Group, we had seen a lot of effort, both in time and money,
18 going toward issues that directly related to or were
19 primarily driven by large break LOCA considerations and
20 given the risk informed world we were moving into, it seemed
21 like the time was ripe to reconsider that. So, that's what
22 we had proposed.

23 We went back to our members. In February '99, we
24 initiated a program basically to evaluate such. And it
25 really had four components: one was to review the
regulations, identify regulatory impact; the second was to
determine what the licensing approach would be for that,
because, obviously it would involve some proposed rule
changes; define a technical approach; and then, also, at the

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1 appropriate time, obtain industry involvement on this,
2 because it couldn't just be a Westinghouse Owners Group
3 effort. So, this was basically phase one of our program,
4 which is really still ongoing.

5 This slide shows the licensing evaluation we did.
6 Basically, there are three specific areas in the Regs:
7 50.46, as well as Appendix A and a number of the GDCs and
8 Appendix A, that all specifically define the large break
9 LOCA, as up to and including the double-ended rupture. So,
10 these were the areas that we knew required attention on our
11 part.

12 MR. SHERON: What exactly were you proposing on
13 this?

14 MR. LIBERATORI: We haven't yet.

15 MR. SHERON: Oh, okay; I'm sorry.

16 MR. SAM COLLINS: The approach, though, is change
17 the rulemaking.

18 MR. LIBERATORI: Yes.

19 MR. SAM COLLINS: The approach is rulemaking.

20 MR. LIBERATORI: The approach is rulemaking.

21 MR. SHERON: I'm sorry, I was going to say that,
22 you know, this maybe considered as part of the option three.

23 MR. LIBERATORI: Yeah.

24 MR. SHERON: Okay; I'm sorry.

25 MR. LIBERATORI: Yeah. Basically, we've been
working for most of this year in a rather deliberate way to
identify what changes were needed; what would be the
technical background for it; how would the utility members
use it; is there a cost benefit; what are the upsides; what

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1 are the downsides and so forth.

2 And I've categorized a number of the benefits
3 here: one is it would allow you to focus the resources on
4 more risk significant or more likely events, as opposed to
5 the large break LOCA; it's to achieve consistency within the
6 application of the LOCA requirements, particularly with
7 respect to the regulations, themselves; reduce regulatory
8 burden associated with large break LOCA. There are a number
9 of tech spec improvements that could come out of this, both
10 with respect to definitions of what operability really is
11 and what functionality is and LCOs, and a number of those
12 things could evolve from this. And, also, peaking factor
13 increases could lead to additional flexibility in core
14 design. What we really found here is -- there are 23
15 members in the Owners Group and everybody has a different
16 number one way they would use this. It's one of those
17 things where it's not one or two really big hitters, but
18 everybody could use this in a different way, depending on
19 their plant specific situation.

20 MR. SHERON: What is the biggest area of benefit?
21 Is this -- I mean, you mentioned a couple there. Is this
22 basically in stuff like ease of generator start time?

23 MR. LIBERATORI: That is one of the lead ones.

24 MR. SHERON: Okay.

25 MR. LIBERATORI: It could be operability -- it
could be -- I might be able to leave an accumulator out of
service.

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MR. WALSH: A few points would be an upgrade would
almost be automatic.

1 MR. SHERON: Yeah. Well, Westinghouse plants, I
2 think, they only mention local entity. So, obviously --

3 MR. LIBERATORI: Right. And you still would have
4 your other -- you know, you would still have DNB and steam
5 reduce, so other limits that would restrict where you could
6 go with this. But, it does give you a little bit more
7 flexibility to work with. These are some of the general
8 categories. But, again, there are pages of different ways
9 people could see themselves using this. And then one of the
10 reasons being fairly deliberate on this is to make sure the
11 effort is focused and we can identify a few things that
12 everybody can get behind.

13 We did last month meet with the other Owners
14 Groups, together with NEI, and EPRI was at the meeting, as
15 well. We presented, you know, where we had gone with this;
16 you know, that we had broken the ground and got the ball
17 rolling. Basically, the industry is supportive of this. It
18 appears where we might be headed, and I can't say that for
19 sure yet, because we're still working out the details, but
20 it appears we might be forming a task force under the NEI
21 risk informed Part 50 working group. That would, then,
22 become the focus with the industry effort on this. So, the
23 Owners Groups would still be engaged. It would still be our
24 work. At least, we would be focused, you know, through this
25 NEI task force.

MR. SHERON: Are you just focusing strictly on
break opening time or are you looking at a broader --

MR. LIBERATORI: Broader than just break opening
time.

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1 MR. SHERON: Okay. But, in terms -- I'm just
2 thinking out loud here. In terms of what the ultimate
3 benefit -- in other words, you could only go so far, okay,
4 and then you're going to run into upper limits, okay. And
5 you get some increase in, say, peaking factor, you know,
6 kilowatts per foot and stuff; but, at some point, you run
7 into a limit like on transients and the like, in which case
8 any further relaxation of LOCA requirements isn't really
9 going to be much of a benefit.

10 What I'm sort of driving at is, there's been some
11 other options kicked around here, okay. One is, for
12 example, just redefining the decay heat curve that's used,
13 instead of the 1971 ANS plus 20 percent, with 79 plus two to
14 sigma set, all right. Baker Just get -- you know, instead
15 of Baker Just, use Cath Carpel from metal water reaction.
16 I'm just curious, because those are -- you know, in terms of
17 the actual rulemaking, okay, some things, I think, can be
18 done a lot easier than, you know, a more comprehensive major
19 overall, because, I mean, obviously, the LOCA provides the
20 design basis for the containment, okay. And if you
21 eliminate -- okay, and there's a lot of margin that we take
22 credit for in severe accidents from the containment. The
23 fact that, you know, these containments hold 50-60 pounds of
24 pressure, but that's the ASME limit.

25 When you look at their ultimate strength, it's,
 you know, three times -- two-and-a-half times as much, and
 you get a lot of benefit and risk base from that. And so,
 we always ask the question, is that if we start backing off,
 are we losing a lot of that margin we had in severe accident

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1 space, because, now, you know, if you don't have the break
2 opening, maybe you don't get the mass energy release and,
3 therefore, you know, somebody says, gee, you know, our
4 containment pressure doesn't have to be as high anymore;
5 it's only 25 pounds instead of 50.

6 MR. LIBERATORI: That would affect the ultimate
7 strength capability of containment --

8 MR. SHERON: Of existing containments. But the
9 question is: what do you do about a new plant, then? Okay,
10 if they go and design the plant to these new revised rules,
11 are they going to come in and say I don't need a
12 containment, it only holds 20 pounds. I mean, you know --

13 MR. WALSH: The area that we started looking at
14 and we're not finished yet, steam line break is just as much
15 pressure as the LOCA.

16 MR. SHERON: Yeah.

17 MR. WALSH: So, unless we can come up with a
18 monitoring system for the steam line break, which would be
19 very difficult, that's going to be a little bit more of a --

20 MR. SHERON: The only reason I'm saying this is
21 that, you know, from a standpoint of getting some benefits,
22 okay, based on improved knowledge, rulemakings that don't
23 have huge sweeping changes to them, okay, sometimes are
24 easier to push through. And in terms of whatever the
25 perceived benefit is, you know, there may be some -- you
know, some relief that you could get that basically gets you
where you're not LOCA limited anymore. You might want to
think about it, that's all.

MR. LIBERATORI: Understood. And as I said, we're

1 spending a lot of time on decisional analysis and framing
2 that, so that we can identify what the benefits are. And I
3 guess what we were proposing here is we think, as an
4 industry, we'd be ready to meet with staff in the first
5 quarter roughly and exchange exactly that kind of dialogue,
6 which obviously has to be a two-way discussion, and where
7 maybe you see it fitting in over here, as well, from your
8 perspective. But, clearly, we would intend to have a 1.174
9 analysis. We'd be looking at extrapolating before break to
10 the analytical arena, where we can't go right now, and where
11 we think we'd be going, in terms of what would be the design
12 basis ECCS analyses, if you will. So, you know, all of
13 these are on our table and we're dealing with those right
14 now. So, you know, we, again, think we'd be prepared to
15 meet with you in the first quarter.

16 MR. SHERON: Okay.

17 MR. SAM COLLINS: Yeah, I think we want to keep
18 our options open. Part 50, option three is a vehicle. It's
19 a study right now.

20 MR. WALSH: That's got some concern with us, that
21 we're behind their areas --

22 MR. SAM COLLINS: Right, and to the extent whether
23 that study ever comes to fruition and how much of it is --
24 becomes practical to apply and what format it's done, and
25 then whether the industry is asked to take advantage of all
of Part 50 or parts of Part 50, I think is just knowledge we
have to put on the table. And the reason is, I think, our
stakeholders, who are interested in improving the
regulations by whatever means, need to understand all the

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1 options. Whether it's a petition for rulemaking or whether
2 it's option two or option three, the expectations have to be
3 clear. Obviously, you're putting a lot of work and
4 resources into this. So, we need to be able to lay out for
5 you what the variances are between these three success
6 paths, and that should be a topic at a meeting that we have,
7 so that we aim this in the right direction and understand
8 what the backside of these processes are.

9 MR. BAILEY: And we agree with you. This is
10 probably the most complex of the issues we're dealing with
11 right now. It started off as an Owners Group initiative a
12 year ago -- or two years ago, almost; but, then, I think,
13 superseded, in some cases, by some of the things that have
14 started to develop within the industry, within the NEI
15 working group. And we saw that at one of our strategic
16 planning meetings and we told them to integrate it with the
17 NEI activities. But, even then, I think it's going to take
18 a considerable amount of dialogue between the industry and
19 the NRC to figure out which path to go down here.

20 MR. SAM COLLINS: Okay.

21 MR. LIBERATORI: Well, we're giving this great
22 attention. Larry, who is Vice Chairman of the overall WOG,
23 is really heading up the team that's working on this. So,
24 you know, we're giving it our highest attention, at this
25 point.

The next topic is containment sump issues. The
WOG has been actively participating with the staff. We've
been involved in the public meetings. We've had
representatives out at the University of Mexico meetings not

1 too long ago. The general consensus of the feedback we've
2 gotten is that the program is well developed and many of the
3 comments have been incorporated. We do still have some
4 limited concerns, which we have forwarded to the staff,
5 primarily in those areas where we're trying to extrapolate
6 engineering judgment. And I didn't plan to go into those in
7 detail here, but they have been forwarded to the appropriate
8 members of the staff.

9 MR. SAM COLLINS: Are you communicating
10 effectively on those?

11 MR. JACOBS: Karl Jacobs. Communication, both
12 with the staff members and the plants, have been very, very
13 good.

14 MR. SAM COLLINS: Good. It's good feedback.

15 MR. LIBERATORI: So, we've been participating on
16 the PIRT panels, both of them. We've -- as I mentioned
17 earlier, we did -- we were able to get two volunteers to
18 step up to be representative of the plants. We continue to
19 urge our members to provide what they need to provide to
20 NEI, with respect to the survey responses. Two items we did
21 want to have a little bit of discussion on: one was the
22 risk-informed approach. It was our understanding that you
23 were going ahead with risk informing the approach, as well
24 as guidance to this issue. We really haven't heard anything
25 on that.

AN We had made an offer to view inputs to that
N analysis. That offer still stands. We're just not sure
R where that stands in your overall progress on this effort.
L But, we're looking for maybe where this stands, as well as

1 where the application of GDC-4 and leak before break stands
2 with respect to this particular issue. We had a meeting
3 about a year ago and, at that time, the staff said they
4 weren't prepared to endorse the Owners Group interpretation;
5 however, you wanted to do more evaluation before you decided
6 on whether leak before break could be applied to debris
7 generation aspect of the issue.

8 And, again, one of the reasons we bring this up is
9 that we don't see anything in the planning right now dealing
10 with the debris generation aspect of it. It's been focused
11 mostly on the transportation of plugging. So, we're
12 wondering if you had gotten to the point where, you know,
13 you knew where you were headed on that or not yet.

14 MR. SAM COLLINS: Tim, Rob, you want to --

15 MR. ELLIOTT: Rob Elliott. As far as regeneration
16 goes, our current plan right now is to scale the BWR data
17 out there for analysis purposes. We have tried -- we've had
18 discussions with the Owners Group to talk about their test
19 program, about whether or not they could address the issues,
20 as far as debris generation goes, and I don't believe we've
21 had any final discussion on that. I know that, Carl, you
22 guys were going to go back and talk over what you wanted to
23 do in the way of testing and we haven't yet met again to
24 find out what was concluded in those discussions.

25 Let's see, what was the second question?

MR. LIBERATORI: It was the risk-informed approach
and the GDC-4 approach.

MR. ELLIOTT: Basically, with the GDC-4 approach,
I think what we have is two different interpretations of

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1 what was approved by the staff originally for GDC-4. And we
2 -- I thought we had said this in the letter to you all that
3 we believed that it would require a rule change to apply
4 leak before break to issues that are related to ECCS design,
5 because the statement of consideration for GDC-4 clearly
6 says that containment functional design and ECCS functional
7 design shall retain their current nonmechanistic
8 requirements for doubling the breaks.

9 So, I thought we had addressed that question; but,
10 what we were, also, going to do, as part of our research
11 program, was to evaluate what the impact on ECCS design, as
12 far as what would be the differences between a double-ended
13 break and a leak, in which debris would be generated by a
14 worse case leak and whether or not that could potentially
15 cause a failure of ECCS. So, we've been proceeding with our
16 research program, with the intention of addressing both
17 aspects of the pipe break and seeing what the impacts are.

18 As far as the risk approach goes, the way we've
19 been treating risk is mostly from an issue of conditional
20 failure probability. Now, we're nowhere -- the reason why
21 we haven't shared any information with you is we're a long
22 way away from being able to do the risk analysis, because
23 there's a lot of information that we want to gather relative
24 to transport and head loss and debris types and that sort of
25 thing. But, we were looking at it from the perspective of
how likely, given a LOCA, were you likely to fail the sump.

AN And that's essentially the way the analysis is
N that is set to proceed right now. We weren't -- basically,
R
L we were looking at it as risk analysis would help us to make

1 a judgment of whether or not any kind of act that would be
2 needed, based on, you know, it is not very likely; where
3 there's other mechanisms, it is more likely to fail the ECCS
4 than clogging them, you know. Obviously, you know, it will
5 probably be a priority issue. If it's highly likely to
6 fail, you know, we're going to need -- we'd have more
7 concerns that we would want to address to the industry.

8 That's, basically, how we've been proceeding. And
9 we've been having discussions with the three Owners Groups
10 and I know that there is still a little bit of confusion.
11 We've been trying to work on explaining it, in more detail.
12 And I thought we had -- we did get some comments on the test
13 program, but I didn't know if there were still comments that
14 we needed to address on --

15 MR. JACOBS: We've sent you some more comments.
16 This was to Michael.

17 MR. ELLIOTT: Okay.

18 MR. JACOBS: One of them did address the
19 risk-informed area; one addressed engineering judgment. We
20 -- it back into the plume and how the plume will do that;
21 how to get the debris off the floor; how the plume cannot
22 really -- can't do that, you have to use engineering
23 judgment to that issue. Those are one of the main items
24 that we're looking at and how you guys can address that
25 area. Our concern with engineering judgment brings too much
conservatism into the analysis. So, those are the major
issues that we have.

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MR. ELLIOTT: Well, I would say, I haven't seen
the letter yet, so --

1 MR. JACOBS: It's with Research.

2 MR. ELLIOTT: Okay. I'll check into that. We
3 have another meeting shortly coming up.

4 MR. JACOBS: You're being forwarded a copy. You
5 were left off by accident.

6 MR. ELLIOTT: Okay.

7 MR. SAM COLLINS: Okay. I just -- Sam Collins. I
8 just want to be clear, Carl, I've got -- on this slide, I
9 picked two issues out: one is waiting NRC risk-informed
10 approach and there's an offer that's on the table, I think,
11 for review; and then the other issue is three quarters of
12 the way down, where we talked about halfway addressing the
13 research program does not adequately address the debris
14 generation and that the Owners Groups still supports the
15 original positions. Are those being worked in forums that
16 you feel like --

17 MR. JACOBS: the issue with the debris generation
18 is we feel very uncomfortable -- there's too much concern
19 with using the PWR OG data to try to scale OG. There's
20 another way of using inside judgment. We'd like to see how
21 we can work that out, but we know the resources are limited
22 on how to address that. We're actually just putting on the
23 table that that's an issue. When you do your evaluation,
24 we've got to make sure that that conservative judgment is as
25 realistic as possible.

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MR. SAM COLLINS: Okay. And you feel like you
will be able to work through that issue, as part of the
process we're currently engaged in?

MR. JACOBS: That's correct. I still think we can

1 work it out. We haven't gotten to that issue right now.

2 MR. SAM COLLINS: Okay. And the issue of the
3 risk-informed approach, Rob, will we respond to that once we
4 see the letter?

5 MR. ELLIOTT: Yeah, absolutely. I just wasn't
6 aware of the letter, so I haven't had a chance to look at
7 it.

8 MR. JACOBS: The research -- Grant was going to
9 put out recently another workshop on that issue and right
10 now, we haven't heard when that workshop is going to be
11 done. It's supposed to be done this quarter. I think it
12 may be postponed into the new year. So, that's one of the
13 other driving forces. We expected to hear in November, but
14 now it may be postponed.

15 MR. SAM COLLINS: Okay.

16 MR. TIM COLLINS: I still have a question of
17 clarification here. When you say "WOG still supports its
18 original position," I thought the original position that you
19 sent in was on the interpretation of GDC-4, not on -- okay.

20 MR. LIBERATORI: That's why it's here. But,
21 basically, it's the same benefit --

22 MR. TIM COLLINS: That's no different than the use
23 of the debris generation -- you know, whether it's being
24 engineering -- it's an engineering judgment call or not,
25 that's different from how you interpret GDC-4 and the
applicability of the debris generation to LOCA. Now -- so,
when you say it still supports the original position, you're
saying you disagreeing with the position the staff issued in
its 1999 letter back, which said this is the way we see

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1 GDC-4. Is that what we're saying here?

2 MR. LIBERATORI: Well, we interpret it -- we
3 interpret the staff's position as -- that this is where you
4 were at the time we met and discussed it.

5 MR. TIM COLLINS: That's correct.

6 MR. LIBERATORI: However, you were going to
7 consider it and maybe rethink it after you had done this
8 work.

9 MR. TIM COLLINS: Now, that's not what the letter
10 was intended to say. The letter was intended to say, here's
11 the way we see GDC-4. Now, if we need to change GDC-4, you
12 know, if we need a rulemaking, we need supporting
13 information to do that, okay. And this research was
14 supposed to develop supporting information to any changes in
15 the regulation; or if it turned out to be a more significant
16 risk area than our initial study showed, possibly back that.
17 But, it wasn't to contribute to the interpretation of GDC-4.
18 It was to contribute to any additional regulatory action
19 that may be taken, whether that be a change to the
20 regulation or some additional back fitting consistent with
21 the current interpretation of the regulation. That's what
22 the letter was intended to say. If you got a different
23 message, then we need to talk about that letter.

24 MR. LIBERATORI: Okay. I guess just for Sam's
25 benefit --

MR. BAILEY: There are actually three here.

MR. LIBERATORI: Yeah. What the three Owners
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N Groups really -- what the three Owners Groups were really
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L trying to say is that the generation is created by the

1 dynamic effects of the break. And the way we read GDC-4, it
2 specifically says the dynamic effects of the break can be
3 excluded, based on before break, and we use that application
4 in a number of arenas. So, if the forcing function is the
5 dynamic effects -- you know, if our position was GDC-4
6 already excludes the dynamic effects, that's why the debris
7 would be limited, and that was our position.

8 MR. ELLIOTT: This is Rob Elliott, again. You're
9 focused on the words and not so much on the intention of the
10 rule. When GDC-4 was put out, it was talking about type of
11 constraints, physical protection of equipment important to
12 safety. It wasn't talking about whether or not debris would
13 be generated, okay. And when we're talking the issue of
14 strainer or sump clogging, what we're talking about is the
15 functional design of the ECCS. We're talking specifically
16 about the functional design of the sump, okay.

17 So, it's not -- when they wrote the statement of
18 considerations, they recognized there was this dichotomy.
19 On the one hand, when you're talking about dynamic forces
20 and impacting equipment and that sort of thing, we
21 recognized that -- or you take credit for leak before break.
22 But, we said specifically in the statement of
23 considerations, functional design is of containment and the
24 ECCS would still retain to one in -- in break. And 50.46,
25 also, is pretty specific about all breaks up to and
including, as you noted on your previous slide.

AN So, the research program that we're doing right
N now is really not focused on -- it would provide us
R supporting information, but it's not focused on redefining
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1 50.46 or even, you know, defining the risk-informed, you
2 know, 50.46. We're using risk as a tool to help us assess
3 the significance of the issue. But, we're not going the
4 mode about -- of a rule change or changing the rules or
5 determining whether or not we can -- it's okay to apply to
6 50.46.

7 MR. LIBERATORI: I understand. That's why I think
8 we've agreed to disagree.

9 MR. ELLIOTT: Yeah.

10 MR. LIBERATORI: The same jet has to be considered
11 here and not considered there.

12 MR. SHERON: Let me ask you, when we changed the
13 interpretation of GDC-4 in the first place, and the reason
14 was, is because we said, you know, until we come up with a
15 better design basis for containment, okay, I mean, to just
16 to sit there and say we're going to eliminate the double
17 guillotine and give credit for leak before break, you know
18 -- you know, I remember back in the early '80s when we did
19 that, you know, the question was, fine, what are we going to
20 design containments to, all right? Are we going to have
21 people coming in saying that, you now, I can eliminate leak
22 requirements and all sorts of other stuff, and nobody had an
23 answer as to how we were going to handle that whole big
24 issue.

25 So, that's why the leak before break was
restricted to the pipe restraints and so forth for the
dynamic effects. And the idea was that when and if we come
up with a better way to design -- or to come up with a
design basis for containment and ECCS, you know, we're

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1 willing to go back and revisit it. But, that -- you know,
2 that never took place.

3 MR. TIM COLLINS: The consideration explicitly
4 identifies that dichotomy. It says, "we recognize it's
5 there," you know, and we have to live with it until we can
6 figure out something better.

7 MR. SHERON: But, I think from a risk aspect of
8 looking at this issue, okay, I think we would certainly take
9 into account in risk base, from a realistic risk assessment,
10 the fact we recognize pipes don't instantaneously settle,
11 okay. And that would show up as part of the risk -- the
12 overall risk assessment of it.

13 MR. SAM COLLINS: The question is, and that's the
14 third issue, I think, that Jack brought up, do we need to
15 put on the docket this task, if we haven't already -- maybe,
16 we have, Ron -- the staff's position in this area, so that
17 the guidelines are clear.

18 MR. TIM COLLINS: It went out a year ago.

19 MR. SAM COLLINS: Consistent with the statements
20 we just -- so, it was just a disagreement on it, whether
21 that's --

22 MR. TIM COLLINS: No, we documented that in a
23 letter.

24 MR. SAM COLLINS: Is that what we're talking
25 about?

MR. SHERON: All we are saying is, you know, we
have to follow, you know, our lawyer's advice and the
statement of considerations clearly restricts it, okay.
But, again, my understanding is, you know, this issue is not

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1 -- this is strictly a matter -- the staff has an itch, okay.
2 Somewhere down the road -- I mean, if we decide that the
3 sump designs are inadequate for PWRs, the burden is on us,
4 okay, to make that case and to follow our own internal
5 procedures for back fitting; and in doing so, we would
6 obviously, you know, have to make a risk argument and the
7 risk argument would have to be based not on something that's
8 overly conservative, but we'd have to take into account the
9 recognition that pipes don't instantaneously --

10 MR. BAILEY: It seems to be a subset of the large
11 break LOCA issue we talked about earlier, obviously, because
12 this is one application of where you're driven down a
13 certain path because of that requirement, where it may or
14 may not be necessary, I guess, in the big scheme of things.
15 But the other part of it is what you design your systems to
16 versus what do you have to make -- to operate them under,
17 too. It seems like that's a subset of this, too, the sense
18 that you want an over design capability to ensure that it
19 can meet even the unsuspected or the unreasonable
20 expectations on it; but on the other hand, you want to be
21 able to eliminate unnecessary regulatory burden, too, and
22 how do you work for that process.

23 MR. SAM COLLINS: I would just ask that we don't
24 continue to agree to disagree. I mean, if there's a
25 question -- OGC is the office that interprets our
regulations for us. So, I think if you feel like this is a
barrier to getting to where we need to go, then there are
ways to approach that and the agency will provide that
original interpretation, if we haven't --

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1 MR. ELLIOTT: We went to OGC --

2 MR. SAM COLLINS: You went to OGC?

3 MR. ELLIOTT: -- and they were in agreement with
4 the position of the staff.

5 MR. TIM COLLINS: But, we do have a process,
6 though, to deal with this. I mean, the risk-informed
7 approach is the way to go on issues like this, you know,
8 where there's a clear disagreement and it involves judgment
9 -- a lot of judgment. I mean, the risk-informed approach is
10 the best way to go. So, that's what we need to head.

11 MR. SAM COLLINS: The risk-informed approach is in
12 the application, not in the --

13 MR. TIM COLLINS: Well, if you need a change to
14 the regulation, as well.

15 MR. SAM COLLINS: Then, you have to change -- but,
16 you do have to change the regulation.

17 MR. TIM COLLINS: Yeah, processes all the way
18 around.

19 MR. NEWTON: Just a comment I would like to make.
20 The words in GDC could stay the same, if the statement of
21 considerations reflected the debris generation aspects of
22 it. That's all we're talking about.

23 MR. SHERON: What we're saying, though, is that
24 would require a rule change, too.

25 MR. NEWTON: It would require that process to be
exercised.

MR. SHERON: Yes, that's right.

MR. SAM COLLINS: Are we back to where we are with
that issue?

1 MR. LIBERATORI: Yeah, and we'll communicate it
2 after some point of context.

3 MR. SAM COLLINS: Okay. Yeah, I think the message
4 from our end is that we understand where you are. We can
5 either self initiate a process or you can ask us to initiate
6 a process. But, clearly, right now, the process has to move
7 one way or the other, to resolve the last statement here,
8 the disagreement in --

9 MR. BAILEY: I think the burden is on us right now
10 to take what you told us and go back and do a summary of
11 what your concerns are.

12 MR. SAM COLLINS: Okay.

13 MR. LIBERATORI: We initiated this program a
14 couple of years ago, prompted primarily by experience in
15 Europe and Japan. As you know, we have a number of
16 objectives, the first one being to establish and maintain an
17 adequate safety level for all of our Westinghouse plants
18 and, then, also to proactively develop a systematic program,
19 which would assess this issue, both short term and long
20 term. And that had components such as evaluating it
21 technically and from a safety aspect, doing so in a manner
22 that would minimize our regulatory risk, also minimize the
23 cost to the WOG and what's the most cost efficient way to
24 approach the issue, and make sure we had an integrated
25 long-term plan.

So, we put that whole program in motion.
Considerable resources have been applied to this thing over
the last few years, including a number of lead planting and
very expensive lead plant examinations on site. The site

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1 work that was under the WOG umbrella, if you will, has been
2 completed and that's, in essence, some of the initial baffle
3 bolt inspections, as well as remove or replacement programs.
4 We have bolts from Farley, Point Beach, and Ginna, have the
5 hot cell. They're in the process of -- well, they're in the
6 procedure process to be examined. Hopefully, we'll have
7 some information from those in the not too distant future.

8 In the meantime, we're continuing the analysis of
9 acceptable bolt and distributions, based on what we learned
10 from the lead plants. We have grouped all of our plants by
11 number of loops, whether they're up-flow or down-flow. So,
12 we're kind of plodding through the groupings, if you will,
13 establishing -- using the accepted methodology and
14 establishing acceptable bolt patterns that they could use
15 for their consideration, in terms of any future work.

16 And we're, also, integrating some of the more
17 generic aspects of the program we initiated with the MRP,
18 since the MRP does exist now. There is an ITG that's
19 dealing with the internals issues.

20 MR. BAILEY: What does that acronym stand for?

21 MR. LIBERATORI: Materials reliability project
22 that, I believe, they've been in to talk to the staff. They
23 just initiated over the last year one of the -- I believe
24 there are four major programs they're working on now and the
25 reactor internals is one of them. So, a lot of the hot cell
work, the funding is actually being picked up by MRP now.
So, we are integrating there, again, making sure that
they're avoiding duplication of effort and the items that
are truly generated -- you know, being treated that way, so

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1 the rest of the industry has an opportunity to see those.

2 This slide, I guess, is somewhat repetitive. But,
3 basically, we had two lead plants that have completed their
4 bolt inspection replacements on site. We had an additional
5 plant do both inspections and did a limited replacement
6 program within the acceptable bounds of the methodology. We
7 have another plant that is presently performing bolt
8 inspection on the other Farley unit, but they're doing that
9 on their own. There's no WOG involvement per se in that,
10 other than the fact that they're using the WOG program as
11 the basis for their efforts.

12 MR. GRUBELIC: What sort of results are they
13 seeing to date?

14 MR. LIBERATORI: In which one?

15 MR. GRUBELIC: The other Farley --

16 MR. LIBERATORI: I don't -- I believe they --

17 MR. GRUBELIC: The original Farley has no
18 indication --

19 MR. LIBERATORI: Right.

20 MR. NEWTON: The inspection has probably just been
21 completed and the only word I got back is that it's going
22 well. I don't have any specifics and I think it's up to
23 them to tell us what the results are.

24 MR. GRUBELIC: Will they be coming in on this next
25 meeting?

MR. NEWTON: Their results will be included and
they've committed to let us know what the results were. I'm
sure they'll make that known even before the next meeting.

MR. LIBERATORI: What's your name?

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1 MR. GRUBELIC: Frank Grubelic.

2 MR. LIBERATORI: Thank you.

3 MR. SAM COLLINS: Sam Collins. Roger, have you
4 thought through how to put this information out, at any
5 given point in time, for industry consumption? Are you
6 going to go through the industry groups or coordinate to the
7 Owners Group or --

8 MR. NEWTON: Just about all of the WOG results are
9 going to be rolled into the EPRI/MRP program. And so it
10 will be available to the industry through their, you know,
11 reports and information releases. If you go to the next
12 slide -- I'm kind of jumping ahead -- we're hoping to meet
13 with you and bring you up to date. Let Lou go through that.

14 MR. LIBERATORI: This one?

15 MR. NEWTON: Right.

16 MR. LIBERATORI: Again, sometime early next year,
17 there will be a joint meeting, which will be asking for us
18 to present the results of where we are in this. Again, the
19 future work would be to complete the remaining analyses. We
20 have done all of the strategic efforts, in terms of
21 identifying the approach, the methodology, how one
22 determines an acceptable bolt in the pattern. And we're
23 really into just completing the analysis for the plant
24 groupings, at this point, and then feeding back any results
25 that come from the individual hot cell examinations.

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Some of the two and four loopers that are
down-flow plants are looking at extending leak before break
to smaller sizes, with the intent, saying, you know, what
affect does that have on the number of bolts that has to be

1 replaced. At this point, that's really just an evaluation
2 phase.

3 Given where we are strategically -- and the
4 program is, to some extent, winding down, if you will -- we
5 plan to propose to our members the transition of the baffle
6 bolting program from a working group directly under the
7 steering committee, to material subcommittee for a number of
8 reasons. One is, you know, we do have the involvement of
9 MRP and a lot of the higher level strategic items. A lot of
10 the strategic items have been resolved. The objectives for
11 most of them have been achieved and we're really just into
12 completion of the analysis. And for the most part, it's the
13 material subcommittee representatives that are attending the
14 baffle bolting working group meetings anyway. So, it just
15 seems like a natural point to just transition this down to
16 the subcommittee, to basically carry out and complete the
17 rest of the program.

18 So, that's where we plan to go with that. And I
19 guess our overall conclusion still is that safety of our
20 plants have been established and we still believe it's an
21 aging management issue and that we have a long-term program
22 in place to feedback inspection results and be able to
23 manage the issue.

24 MR. SHERON: This is Brian Sheron. You had said
25 this was a MRP/EPRI program. Now, is that -- are there any
restrictions? Because, I know not everyone is a member of
EPRI, so does everybody get this information or it's only
EPRI members that get the information?

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MR. NEWTON: Do you want me to talk about it?

1 MR. LIBERATORI: Yeah.

2 MR. NEWTON: The program is being classed -- my
3 name is Roger Newton -- as a category 1 EPRI program. So,
4 when non-EPRI members need that material, they're able to
5 buy it and they have an annual requirement to almost buy it.
6 Anything that comes up as related to safety is classified as
7 Class One and non-EPRI members are ending up buying that
8 every year. So, they have access to it. So, it fits in
9 that category. Most of the information and the long-term
10 forward plan will probably be in the MRP program and the
11 WOG, you know, is participating in that, as an active
12 member, as well.

13 I think that group will then have to figure out,
14 okay, what's necessary to feed back into the long-term
15 programs of the utilities, probably more related to license
16 renewal than to, you know, the current operator. So, that's
17 a long-term effort.

18 MR. BLOOM: Did we skip over generic district 23
19 temporarily to include the break time?

20 MR. BAILEY: This program is probably an example
21 of where we took a generic issue that was predominantly one
22 Owners Group, which took the lead, but they were able to
23 coordinate it and work it through the industry. At the same
24 time, that was changing, because the MRP wasn't even in
25 existence when we started this program and that got formed,
you know, along the way, too. So the issue about how do we
deal with generic issues, this is certainly one example of
how it can be done, but it doesn't work for all issues, as
we know, under ASME.

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1 MR. SHERON: Well, this was one that was actually
2 initiated by the industry, not by the NRC, and we've kind of
3 -- you know, kind of just sat on the sidelines and
4 monitored, you know, how you are proceeding with it, without
5 really, you know, getting involved from a regulatory
6 standpoint. So, from that standpoint, I think we've been,
7 you know, fairly pleased on the way you've taken the
8 initiative on this.

9 MR. SAM COLLINS: What's not clear is the
10 regulatory issue here, I think, initially, at least, so
11 certainly, we're interested. I mean, we're monitoring, but
12 we're very interested. I think the efforts have been very
13 productive. I'd be curious -- Chris, how would an item like
14 this be captured into the age related degradation program.

15 MR. GRIMES: My name is Chris Grimes. I'm the
16 chief of the License, General and Standardization Branch.
17 And it gets captured in the context of the adequacy of the
18 agent management programs for reactor vessel internals. And
19 to the extent that we've ended up struggling somewhat trying
20 to understand the distinction between the Owners Groups
21 activities, primarily we learned some lessons in terms of
22 feedback from the Oconee review that literally spilled into
23 the Calvert Cliffs conclusions, because of a lack of
24 understanding about how MRP is dealing with the vessel
25 internals for decals like void swelling, extent of IASEC,
the nature of enhanced inspection techniques. All of those
things are questions that are coming up in the context of
trying to find a theme and a consistency between the owners.

Yes, you've -- we'll get into a little bit about

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1 how we've been dabbling in WOG topicalals, but not really
2 developed any conclusions, because all of our energy and
3 effort have been concentrating on developing findings of
4 adequate aging management programs for the CE and the B&W
5 plant. But, that doesn't mean that we haven't continued to
6 make progress on the Westinghouse work.

7 MR. SAM COLLINS: Okay.

8 MR. LIBERATORI: I've been asked to reverse the
9 next two items, so I'm going to cover the license renewal
10 first.

11 MR. GRIMES: For which I'm very grateful.

12 MR. LIBERATORI: Basically, we've had five generic
13 topical reports submitted. Of course, staff reviewed. They
14 are on the topical status table at the end of the
15 presentation. But, beginning with the RCSD supports, which
16 we're up to Rev 2, which was submitted in March of '97. The
17 initial one was July of '95. In this case, we responded to
18 two rounds of RAIs and I guess it was under -- it was our
19 impression that the draft safety evaluation was supposedly
20 new sign off, but approximately two years ago, and we
21 basically haven't heard anything yet.

22 The remainder of these have all been submitted in
23 the '96, '97 time frame. We responded to RAIs here and
24 responded to additional question on class one piping.
25 Again, RAI has been responded to, as well as to additional
 questions. We've responded to some RAIs on the containment
 structure GTR. We haven't had any feedback yet. And on the
 reactor internals, we do have additional responses, which we
 are working on that we're going to submit, you know, this

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1 month. And I guess we just observed that when we were doing
2 some project tallying, we've, basically, paid almost
3 \$335,000 in fees for the review -- for the combination of
4 reviews here. And we haven't received any SCRs yet and I
5 guess we'd be curious what the status was.

6 MR. GRIMES: And that status -- first of all, I
7 apologize. You should have been getting some more cogent
8 feedback, in terms of what progress we've made. RCS
9 supports SER. Actually, it wasn't very near in November
10 '97. That was -- that ended up being a trial effort on our
11 part. That was one of our first attempts at righting a
12 topical SER for license renewal. And quite frankly, it's
13 been completely rewritten since that time, to factor in some
14 of the lessons from the Calvert Cliffs and Oconee's review.

15 You' haven't heard anything, and that's good news.
16 We haven't needed any further information. But, it, also,
17 suffers from a lack of schedule driving. Actually, we
18 suspended work on the Westinghouse topicals in '98 and we
19 only resumed earnest effort on the Westinghouse topicals
20 early last year. And that figure looks about right. You
21 haven't been paying for all of the experimenting we've done
22 with your topicals, but we have been making progress. I'm
23 hoping that we'll have some products out here for you very
24 shortly. But, we're still concentrating our efforts on the
25 products for the Calvert Cliffs review and the Oconee
review. And now, we've distracted some talent to go off and
do generic aging lessons learned, in response to the
industry concerns about the standards for augmenting aging
management programs. So, you suffered a little bit from

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1 that, too, because we distracted some of the talent that was
2 working on these safety evaluations.

3 We haven't charged you -- you've gotten more
4 effort than is reflected in that value, because we have been
5 working this almost as a fourth, fifth, sixth priority, in
6 some cases. But, we've been continuing to work it. We
7 haven't charged you for all the experimenting we've done on
8 your topical evaluations. But, I will make a point of
9 making sure that one of those products breaks out of here
10 soon, so that you'll have some tangible evidence to account
11 for the investments you've made.

12 MR. SAM COLLINS: Chris, I need to understand
13 perhaps from both sides here how we define success for this.
14 I mean, success is to have these reviews complete by the
15 time that Westinghouse --

16 MR. GRIMES: A time for them to be referenced by
17 Turkey Point, which will be the first license renewal.

18 MR. SAM COLLINS: Right. So, if we back up from
19 there, where are we on our schedule?

20 MR. GRIMES: Turkey Point submittals due in 2000
21 and -- June of 2001, I believe, so long as I get them done
22 in calendar year 2000.

23 MR. SAM COLLINS: I think -- again, what I'm
24 asking you is -- perhaps we need to sit down internally with
25 the benefit of our stakeholders and lay out the schedule for
getting these out and be sure that being in anticipation of
supporting a license renewal, so that the process is one of
instead who is who, what, when. And --

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MR. NEWTON: We have -- the license renewal group

1 is meeting in the next two days, so this is a subject that
2 I'll bring up with them. I'm not wanting to guess at Turkey
3 Point, but they are starting to do their aging management
4 reviews and topical report approval dictates how you do that
5 review and what you reference. So, we're running out of
6 time, to be able to -- for Turkey Point.

7 MR. GRIMES: Unfortunately, so does Gaul and so
8 does the standard format. Turkey Point told us to work on
9 Gaul and the standard format, for the topicals; that they
10 want the topicals, too. So, you know, give me some targets
11 that you think are realistic, in terms of completing the
12 topical evaluations, and we'll try and fold them into the
13 plan and we'll go get some more resources.

14 MR. SAM COLLINS: Yeah, I mean, that's what we
15 need to do. I mean, it's -- the expectations just have to
16 be clear and, you know, of course timing is everything in
17 these. And then we will even budget for it or we'll have
18 it. And then we'll sit down and go through our internal
19 processes and find out what the impact is. But, clearly,
20 there's a startup cost with these. But, if we have external
21 stakeholders, who are relying on this to do work, then we
22 need to recoup a little bit and understand better what the
23 needs are. So, I think that's a short-term issue that we
24 need to get feedback on.

25 MR. LIBERATORI: The next slide, I think, shows
the drivers. We do have several Westinghouse plants
indicating interest in license renewal. They want to refer
that. And, also, the current program we have in place,
which was originally envisioned to be a five- to six-year

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1 program, is -- you know, as a WOG, we're ready to kind of
2 close that and move on to where we think we need to be,
3 which is, you know, a supportive role as the applications
4 actually come in. So, we're at that turning point as a WOG
5 now, trying to move from the original program to where we
6 think we need to go.

7 MR. SAM COLLINS: So, Roger, I'm hearing there
8 will be a meeting in short-term to lay this out?

9 MR. NEWTON: The next two days we'll talk about
10 this. Chris, we'll get back to you. Really, Turkey Point
11 needs to be identify their needs. Beyond Turkey Point, we
12 still want to be able to use these. And there are some
13 utilities coming right behind them; if they can't use them,
14 the next ones will.

15 MR. GRIMES: I'm as anxious as you are to try and
16 bring closure to these. They've, quite frankly, suffered
17 from a lack of priority, because we're looking at trying to
18 support milestones that are next week, next month, next
19 year, to lay more the groundwork for all of the folks that
20 are now signed up to submit applications in 2001, 2002. You
21 know, we're now trying to get smart about how we're going to
22 prepare for the bow wave, and issuing the Westinghouse
23 topicals is, you know, one of the things that we need to do.
24 We, also, need to -- we've got one more B&W topical to
25 finish, too, that we need to finish before February of next
year.

AN But, we were, also, looking at -- you know, we put
N some more attention on the infrastructure pieces that the
R
L industry as a whole wanted, like the standard format. And

1 now, I expect we're going to, you know, put a lot of effort
2 in on Gaul and trying to concentrate on the -- for the
3 industry, as a whole, which of the programs need to be
4 augmented for license renewal. Clearly, reactor vessel
5 internals is an area where there's still a lot of work to be
6 done between the industry and the NRC, to come up with some
7 common aging management attributes. There are some subtle
8 areas in, for example, containment structure, where there's
9 some details to iron out. We're still trying to resolve
10 industry questions about how much credit to give for IWE,
11 IWL, and how far does that go and how much implementation
12 experience is there -- some of those details.

13 I think the RCS supports -- I'm not going to say
14 that it's near closure again, because that's what you were
15 told in '97. So, I'll just tell you, that's the one I think
16 that's closest to completion and I'll concentrate on trying
17 to close that one.

18 MR. SAM COLLINS: Okay. As long as you understand
19 the expectations and we'll go into our planning process.
20 You know, we'll test it, certainly, but we're going to our
21 planning process and then Chris's role is to determine the
22 amount of resources needed to bring that up. We'll make
23 adjustments.

24 MR. LIBERATORI: GSI-23 closure: I mentioned up
25 front that we haven't been involved in the meetings with
staff. We discussed the approach to closure of GSI-23. We,
also, made a presentation at the October 1, ACRS meeting.
ACRS did agree with closure of the generic aspects of it,
based on the steps intended to go to look at specific

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1 plants, with respect to risk sensitivity.

2 We, within our WCAPs, as well as our individual
3 IPEs, have assessed seal LOCA from reactor coolant pumps and
4 believe, at least for our plants, the core damage frequency
5 sufficiently low, that the event does not speak of the risk
6 significance, as far as we're concerned. We do have the
7 WCAPs still on the table from 1984, the last rev, to 1986.
8 As a WOG, we're still requesting an SER on that, because a
9 lot of people have used it for licensing purposes, as well
10 as their IPEs, and I guess lost in all of this is what the
11 staff's intent of what that WCAP is, as part of its closure
12 plan. We were curious, you know, had you come to a
13 conclusion about how you intend to deal with the WCAP or
14 not.

15 MR. TIM COLLINS: I don't think we thought about
16 it.

17 MR. SHERON: A resolution of GSI-23, and now that
18 seems to be a reality, that's a question we have to answer.
19 But, I don't think we thought about what to do with that
20 topical report.

21 MR. TIM COLLINS: Yeah.

22 MR. SHERON: We'll get back to you on how we want
23 to proceed on that WCAP.

24 MR. SAM COLLINS: What's the -- is there a date
25 certain that you are --

MR. LIBERATORI: Well, it represents the
Westinghouse sealed model, if you will, the PRA model, in
terms of the probabilities, as well as the flows, and many
of the members have used those in station blackout. They've

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1 used them in IPEs. So, it's a model that people have used
2 and it was submitted, again, at that time, for staff review
3 and concurrence. And it's been tied up in the GSI-23
4 resolution, basically, for the last 15 years. But, if it
5 were to not get an SCR, be withdrawn, as an industry, we
6 have to decide how we want to deal with that, because many
7 people have used this in a number of different places.

8 MR. TIM COLLINS: It's a complicated problem,
9 because the closure of the issue doesn't agree with the
10 Westinghouse WCAP. It closes the issue, but it doesn't
11 agree with the model in the WCAP. So, it's not just like we
12 put a stamp of approval on the WCAP and send it back saying,
13 it's been approved as part of the closeout of GSI-23,
14 because they don't agree. So, it's not just a simple
15 problem.

16 MR. LIBERATORI: I guess it's our understanding
17 the staff did use the Westinghouse model as the starting
18 point for their own work.

19 MR. TIM COLLINS: That was the starting point,
20 right. But the model -- they, ultimately, issued, as the
21 research model for Westinghouse, pump CS. It's different
22 than the one that you've submitted.

23 MR. SHERON: The point is that, you know, we've
24 never said they're not in compliance with the station
25 blackout rule.

MR. TIM COLLINS: Right; right; right.

MR. SHERON: It's our burden, okay, and we
recognize that. If you look at the closeout of 23, it,
basically, says it's our burden; that if we feel that there

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1 are some plants out there that may pose an unacceptable risk
2 due to pump seal failure, we will analyze them and we will
3 engage probably those licensees on a plant specific basis
4 and the like. So, I would probably argue that regardless of
5 whether or not we've issued an SER or not on that, the
6 burden is in our -- the ball is in our court; it's not in
7 yours anymore. Your plants meet the regulations.

8 MR. TIM COLLINS: The closeout of 23 says the
9 station blackout rule is finished, as far as the pump seal
10 stuff goes. That's the recommendation from Research.
11 However, this -- the approval of this model, I think, creeps
12 into a risk informed space now, because it's going to be
13 used in risk-informed considerations. And if we're not in
14 agreement for its application in that arena, I'm not sure
15 where we are. We've still got a little bit of disconnect
16 here on what this seal model really means and how it's going
17 to be used in the future.

18 This is not -- the WCAP doesn't address
19 specifically just station blackout. It addresses a specific
20 sealed model used for all applications. The closeout of
21 GSI-23 says station blackout is okay; it doesn't need to be
22 revisited. But --

23 MR. SHERON: We were hoping that the ASME
24 committee that is providing the guidance on PRA standard,
25 you might say, you know, we specifically are asking them to
address the issue of what is the standard going to say
regarding a pump seal model.

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MR. LIBERATORI: It took a while to get the
flashlight back on. I just want to make sure it doesn't --

1 MR. SHERON: Sure.

2 MR. SAM COLLINS: I guess, Tim, maybe we should
3 just check to see where this is in the priorities, now that
4 we have the guidance; look at how this is --

5 MR. TIM COLLINS: Sure.

6 MR. SAM COLLINS: -- prioritized.

7 MR. TIM COLLINS: Sure.

8 MR. DRAKE: I guess I would add one thing. In the
9 past, we've gone out to individual plants; we've been asking
10 questions on the seal models that they've been using, for
11 our WCAP cap, which are really generic in nature. And
12 instead of asking the individual utilities, those questions
13 really should be coming back to the Owners Group. Because,
14 utilities come back to the Owners Group to us and say, hey,
15 I'm getting these questions on the WCAPs and it's not a
16 plant specific question, it's a question on our topical
17 report, and we've had to come back to the staff with those
18 and say, that's really a generic question; bring it up
19 generically, don't bring it up in an individual plant. So,
20 I would ask you to look at that, as you're going after the
21 individual and assessing the individual plant, as to the
22 generic applicability of the question you're really asking.

23 MR. TIM COLLINS: You said this has been happening
24 already?

25 MR. DRAKE: Well, the last -- I've been following
this for the WOG for about 10 years. And going through this
three- or four-year cycle, where all of a sudden a couple of
plants get asked questions on the topical report, it comes
back to the analysis subcommittee. We've come down and

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1 talked to the staff on the WCAP. We've explained what it
2 is. They said okay, they'll get back to us. A couple of
3 years later, a couple other utilities get a couple more
4 questions and it's the same cycle. We've made three or four
5 trips in the last 10 years, basically, on the mall.

6 MR. LIBERATORI: NUPIC/Technical Audit: this was
7 an evaluation that we helped set up. It was not funded by
8 the WOG, but, basically, was the NUPIC team doing an audit
9 of Westinghouse's analytical capabilities, if you will, and
10 how they process that type of work in-house. The NUPIC
11 team, those teams tend to be fairly large. In this
12 particular case, there were 36 people from 24 different
13 utilities that were involved in this team and what we did do
14 was solicit the assistance of five technical specialists,
15 five utility members from our analysis subcommittee to work
16 with the NUPIC team, you know, strictly from a technical
17 point of view, not only to assure that they were looking for
18 the right things, but there was information we wanted to
19 bring back to the WOG, too, to satisfy ourselves.

20 So, that was held, basically, the first week of
21 May. And the scope, basically, looked at both the active
22 large break LOCA models, both the BART/BASH, as well as the
23 Best Estimate Model, and looked at the NOTRUMP small break.
24 We looked at the process for how internally Westinghouse
25 deals with 50.46 and the generation of information for the
reporting that's necessary, and, you know, a number of other
items that the audit team was pulling the string on, as they
were going through their audit. So, basically, we tried to
cover the gamut of loss of coolant work within

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1 Westinghouse's shop.

2 And we do have an audit report out. It's
3 available to us. We, at NUPIC -- again, this was not a WOG
4 report. You know, given the huge amount of -- almost 150
5 man -- persons of effort, if you will, we were able to come
6 up with three findings and one observation, in dealing, you
7 know, technical primarily with that work, which we thought
8 was amazingly low. So, as a WOG, we were fairly happy with
9 what they came out with.

10 Westinghouse is in the process of responding to
11 all of those items. And the way the WOG is staying plugged
12 in is those individuals from our analysis subcommittee are
13 following the response to those issues and providing
14 oversight on our behalf to the closure of those items. So,
15 we were fairly pleased with the LOCA work.

16 MR. SHERON: This is Brian Sheron. One of the
17 things I was curious about, first of all, how many people
18 were on the audit team and what -- their expertise, I
19 presume, was in like thermohydraulics LOCA and everything?

20 MR. LIBERATORI: To some extent. It was a fairly
21 varied background. Typically the NUPIC teams are. You
22 know, we provided the five technical people from our
23 subcommittee, just to make sure that we had, you know,
24 direct analytical capabilities.

25 MR. SHERON: That wasn't -- the original concern
on this was that when the industry went out and audited the
vendors, that it wasn't just a paper audit to make sure that
the right dotted lines got signed and everything, but to
make sure that, you know, the technical work was up to

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1 snuff.

2 The other question I had was if -- do the WOG
3 members, they have this NUPIC audit report on file somewhere
4 as, I guess, demonstrating their complying with Appendix B,
5 in the sense that they've gone out and audited their
6 vendors? So, I mean, if an inspector came out and looked,
7 they could go into the files and find this NUPIC report that
8 said that, you know, I've complied with Appendix B?

9 MR. LIBERATORI: It's available to any inspectors
10 who ask for it.

11 MR. SHERON: Okay.

12 MR. LIBERATORI: Typically, they work through the
13 quality assurance organizations of the utilities. But, in
14 this case -- to answer your first question, you know, we did
15 provide five of our most experienced guys from the
16 subcommittee, who had been involved in analysis for many,
17 many years, to assure ourselves that we did have the right
18 technical --

19 MR. SHERON: That was sort of a critical part of
20 the NUPIC follow-up after the Siemens issue, was to make
21 sure that the audit teams had the qualified technical people
22 on them.

23 MR. LIBERATORI: That it was not a paper review.

24 MR. SHERON: Right.

25 MR. LIBERATORI: Exactly.

MR. SHERON: When you're all -- I guess you're
telling me you're kind of satisfied that --

MR. LIBERATORI: We're satisfied.

MR. SHERON: -- what NUPIC is doing is meeting

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1 those objectives and everything?

2 MR. LIBERATORI: That's right. And it was
3 comprehensive; it was objective. You know, we were pretty
4 happy with the way it worked out.

5 SPEAKER: This one, in particular. I mean, we've
6 had the same history with NUPIC audits in the past, where we
7 didn't necessarily look at those things in depth. But, this
8 one was in response to the particular audit, as Siemens, to
9 make sure we did do some of those.

10 MR. RICHARDS: Do you know if Siemens put out a
11 copy of the NRC report on -- or rather Westinghouse put out
12 a copy of the NRC report on Siemens and did a review of
13 that?

14 MR. LIBERATORI: Yes.

15 MR. RICHARDS: You said the low number of findings
16 had some pretty stark contrast to the Siemens report.

17 MR. SHERON: The Siemens report might have been a
18 wake up call for some vendors.

19 MR. LIBERATORI: I can't speak for what
20 Westinghouse did between the report and the time we did this
21 audit, but they certainly have the audit.

22 MR. SAM COLLINS: I guess the question is, in the
23 audit scope you looked at, the Siemens report determined
24 what was appropriate to look at and that was taken into
25 consideration?

MR. LIBERATORI: Yes. And that's why we went --
we went right after the models. This was a technical
review.

And the last item I wanted to touch on briefly was

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1 -- it's become more prevalent over the last few years to
2 have staff send us some draft reports for comment. And, you
3 know, we appreciate that and we want to comment on those
4 items. But, typically, there's a 30-day turnaround time and
5 I've listed, I think, the last that we've gotten, that we
6 commented on, and the 30 days has turned out to be somewhat
7 tight for us, for a number of reasons. One is we have to
8 get the comments from the members and consolidate them and,
9 in some cases, depending on the issue, we may be talking
10 with the other Owners Groups and NEI and 30 days tends to be
11 pretty tight.

12 And, also, we have to, as a steering committee,
13 get some funding in place, because we don't have a slush
14 fund sitting out there, you know, whether to comment on
15 draft reports. So, you know, we have to do a little bit of
16 work to get some funding in place to get that done. And I
17 guess we were curious whether the 30 days is something that
18 you've established arbitrary, whether they can be somewhat
19 flexible in the future to allow us more time -- you know,
20 provide the comments on these things.

21 I know on the AOV report, you know, we
22 specifically asked for a delay and you allowed us more time
23 to comment on it. That one tended to be -- I mean, I think
24 it was a few inches thick and we need a lot of time to get
25 through that one. Again, we appreciate the request and we
do want to comment on these things. I just wanted to put
you have a little more time to do it.

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MR. DEMBECK: My name is Steve Dembeck. I'll
respond. I talked with Research. A lot of these issues

1 were AEOD items and there was a big backlog and I guess
2 they're just trying to close them out as quickly as
3 possible. They've told me if you get a particular issue and
4 you need more time, whether it be 30 days, or 45, 60 days,
5 whatever, you should just contact the point of contact
6 listed on that -- on the letter to you.

7 Obviously, we're sending it out for peer review,
8 therefore, we do want you to give a good thorough review of
9 the product. And we'll try to work in the future on getting
10 far fewer of the 30-day request.

11 MR. RICHARDS: Stu Richards. One of the things
12 we're doing with licensees is we negotiate the -- we
13 negotiate a date, I guess, and we put it in the letter
14 saying, hey, we talked to somebody on your staff and we
15 agree to respond back a certain date. So, maybe we can try
16 and get -- explore getting more into that mode and, you
17 know, negotiating what's a reasonable time to get back.

18 MR. LIBERATORI: I know the case of the AOVs, the
19 date of the actual document from the Brookhaven, I think it
20 was, was more than a month prior to the date of the letter
21 requesting us to comment on it. And we found out about it
22 by receiving -- I, personally, received it in the mail. We
23 didn't even have a warning that it was coming, and we had 30
24 days to respond to it. So, we certainly would appreciate
25 either a heads up or

MR. RICHARDS: Sure.

MR. LIBERATORI: -- and then the ability to
negotiate is fine.

MR. SHERON: This is Brian Sheron, again. I have

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1 periodic meetings with our Office of Research and let me
2 bring this up and put this on their radar screen and see if
3 they can -- I mean, if this is common to other Owners Groups
4 and stuff, rather than just sit there and negotiating all
5 the time, I think we should just see if we can expend the
6 period of time to say -- what do you believe is reasonable?
7 What sort of a date -- I mean, is 45 days or 60?

8 SPEAKER: At least 60 days.

9 MR. LIBERATORI: Sixty is a good time.

10 MR. SHERON: Okay.

11 MR. LIBERATORI: If you can tolerate it.

12 MR. SAM COLLINS: I think that's reasonable. We
13 take -- study 10 years worth of data and 60 days to review.

14 MR. LIBERATORI: Okay. I have WCAP tables. If
15 you recall about a year ago when we were down here, I think
16 this first table was some 15 item or so long. And we're
17 very pleased with the progress we've made with the staff on
18 getting SCRs out and in some of the cases, we've gone back
19 and looked and withdrawn a few. So, we've been able to
20 scale this list down to -- right now, essentially, it's just
21 three.

22 The post-accident sampling WCAP, which we
23 discussed earlier, the break opening one, which is still on
24 the table from a generic perspective, and the RCPC WCAP we
25 just spoke about a few minutes ago. And then separate from
that, we have -- we have still listed the five license
renewal WCAPs separately at this point. And we're just
carrying dates, as last we received them, but we understand
-- you know, we'll be talking about those.

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1 Right now, that's all we have on the table
2 already.

3 MR. SAM COLLINS: Do we need to focus on any of
4 these, other than we've already discussed, Lou?

5 MR. LIBERATORI: I think we talked about all of
6 them.

7 MR. SAM COLLINS: Okay.

8 MR. LIBERATORI: The next sheet shows some
9 anticipated -- the next year to year-and-a-half. This first
10 one, the ASICS replacement modules for the protection
11 systems is a subgroup effort. Within the WOG, a subset of
12 utilities can get together and work on something separately.
13 So, this is not a generically funded WOG program, but it is
14 one of our subgroups. And that subgroup does plan to come
15 in, in the first quarter, sort of carry them on the table
16 here. And we have a number of generic programs here, mostly
17 dealing in the risk-informed area.

18 The logic and reactive chip AOT and STI extensions
19 is really an outgrowth of some of the programs we've had
20 ongoing that you've issued SCRs on this. This was a
21 follow-up phase to some existing programs.

22 The risk-informed ATWS, we've had some several
23 meetings over the last year on that and, you know, we
24 believe they were commonly headed in the right direction on
25 that. And we plan to have that in the middle to third
quarter of the year. And the remainder of these are
risk-informed AOT extensions that we're working on in-house,
as a WOG, and we're, also, looking as to how that gets
integrated with the overall industry effort on risk-informed

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1 tech specs. These here are pieces that we're working on
2 that, at least at the current time, we plan to come in with
3 WOG submittals for.

4 MR. SAM COLLINS: Are any of these going to have
5 lead plants with them or are they going to be --

6 MR. LIBERATORI: I don't -- I'm not sure. South
7 Texas has stepped up for a number of these, but I don't have
8 that breakdown at this point.

9 MR. SAM COLLINS: They had their list of
10 exemptions, as you know, that they've come in for.

11 MR. LIBERATORI: Right.

12 MR. SAM COLLINS: Okay. So, I guess we would ask
13 you to put those together.

14 MR. LIBERATORI: No, they are -- Wayne Harrison,
15 South Texas, happens to be the Chairman of the Licensing
16 Subcommittee; so, clearly, this engagement there.

17 MR. SAM COLLINS: Okay. Because, that
18 reconciliation would help us plan our resources, as far as
19 what we're already focused on and, clearly, South Texas is
20 looked at as more or less a pilot for option two for
21 risk-informing Part 50.

22 MR. LIBERATORI: We're still framing our strategy
23 on that, as well.

24 MR. SAM COLLINS: Okay. It might be -- Brian, you
25 can decided, but we might want to consider once you do that,
sitting down at a meeting and ensure that we have these
parceled out correctly, not only externally with the Owners
Group, but internally. Because, Part 50 would drive -- if
there are separate licensing actions, then they need to be

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1 prioritized.

2 MR. LIBERATORI: We need to integrate with the
3 other Owners, as well.

4 MR. SAM COLLINS: Okay.

5 MR. SHERON: For the most part, we look for in
6 plant, you know, for the submittal.

7 MR. LIBERATORI: But, that was a shot, that's what
8 our crystal ball says now.

9 MR. SAM COLLINS: Okay.

10 MR. WALL: I presume that the WCAPS on AOT and STI
11 will contain some quantitative risk evaluations. I got some
12 indication earlier that they were going to be qualitative,
13 but I -- you know, the CI submittals, for instance, we were
14 presented with a 15 x 12 matrix as results, and I don't know
15 it should go that far, but I don't think we can make sound
16 judgments, even with lead plant, based only on qualitative
17 information, if that was the intent.

18 MR. LIBERATORI: I understand your comment. We
19 don't have representatives of the licensing subcommittee
20 here today, so I don't want to directly respond. But, I
21 understand the comment.

22 MR. WALL: My name is Miller Wall, if you didn't
23 hear it.

24 MR. LIBERATORI: Any other comments?

25 [No response.]

MR. LIBERATORI: Okay. Back to you, if you've got
anything else, at this point.

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MR. SAM COLLINS: Okay.

MR. SHERON: I've got a couple of items here I've

1 got to kind of just put out on the plate. One is, last
2 week, we had a workshop in Chicago, which was noticed and
3 everything. It was on voluntary industry initiatives. Do
4 you all have any -- we only had 11 people show up and I
5 don't know whether it was just because of lack of interest,
6 or everybody is just totally so happy with voluntary
7 industry initiatives, you have no comments on it.

8 We were -- it was kind of a double-edged sword.
9 When I talked with my staff, I wasn't personally there, but
10 I talked with Jack Strosneider, and he said, well, the bad
11 news is that only 11 people came; the good news is we had a
12 great conversation there, and the like. So, I was just
13 wondering what your -- whether or not you had somewhere
14 there; where you're coming from on this issue?

15 MR. LIBERATORI: I guess I need to apologize. We
16 had worked among ourselves. We had a number of conflicts
17 and we did designate -- have designated someone from the
18 steering committee to attend that meeting. And at the last
19 moment, the day before the meeting, something came up with
20 the utilities, so he couldn't attend, and we just didn't
21 have time to react to send another person there.

22 MR. SHERON: But, I mean --

23 MR. LIBERATORI: We had every intention of having
24 an individual there.

25 MR. WALSH: I was at the July one out in Chicago
and we intended to be at this one, but it just so happened
we had a conflict.

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MR. SHERON: Should we schedule another one or is
there -- I don't know how --

1 MR. SAM COLLINS: Do you have issues you feel you
2 need to present to us that aren't already on the agenda?

3 MR. NEWTON: I was going to ask how the meeting
4 went and what came out of it; that -- you know, you said
5 good discussions. Are there key points that are new or
6 definite to the --

7 MR. SAM COLLINS: Did we transcribe the meeting?

8 MR. SHERON: Yes, it was transcribed. There's a
9 transcript somewhere. The ones I had heard about actually
10 focused in on -- there was a lot of revelations on fees that
11 were being charged and the like, and people were going, gee,
12 I didn't know we were getting charged with that. And, you
13 know, I told one of the staff, I said, you know, I think we
14 ought to take the whole fee thing and give it to the
15 industry and say, you know, our budget is so much, you
16 figure out how much. Because, they didn't realize that for
17 some generic reports that were being submitted, how they
18 were being charged, whether they were being put in the
19 general fee base or people saying, gee, you know, I'm a PWR;
20 I will talk to BWR and sort of pay for that. So, I'm not --
21 that's my understanding as how the conversation went.

22 MR. BAILEY: Do you all have guidelines on how you
23 make that determination for meetings; for example, whether
24 you -- how you consider they're generic versus not generic
25 or whether you charge or not charge?

MR. DEMBECK: Yeah. This is Steve Dembeck. The
basic rule is if it's related to an application you submit,
then we bill you for that; if it's an informational meeting
like this, meaning we don't bill you for that.

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1 MR. SHERON: Well, this wasn't for the meeting,
2 itself. This was just for how we review -- for example,
3 voluntary industry initiatives, when the industry submits a
4 topical report, you know, Howard gets charged and
5 everything. So -- anyway, I was just more or less curious
6 whether or not we should --

7 MR. LIBERATORI: I'll just make an observation
8 that, you know, at some of the industry meetings we intend,
9 there seems to be more interest than what the fees are being
10 charged for and the amounts of the fees. You know, we talk
11 about license renewal a little bit here; but on some of our
12 other programs, we've seen what we think maybe is increased
13 fees over what we've been used to in the past, in terms of
14 staff review of WCAPs and items, to the point where, you
15 know, what we pay for the fees on the reviews is a
16 significant percentage of what we pay for the product in the
17 first place. So, we have seen some tendency in that
18 direction and I think the other Owners have, as well.

19 MR. SAM COLLINS: Okay. That's -- we intend to
20 discuss that topic at the regulatory information conference,
21 to have a session on fees and billing, so that would be
22 appropriate. But, clearly, any specific examples you have,
23 we should use those as cases, because essentially the staff
24 level is going down.

25 The level of effort, as part of our planning
process -- we have what amounts to be labor rates for our
practices and we monitor those. I mean, some are higher
than others, but we do monitor those. Part of work planning
center is going to be to establish the baseline for those.

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1 So, we intend to improve as a learning organization. But, I
2 mean, if there's a perception there that there are some
3 outlines, please bring those up and we'll take a look at
4 them specifically for lessons learned.

5 MR. BAILEY: Did any participate in the workshop?

6 MR. SHERON: Yeah, they were in the count. I
7 think -- let's see -- I think Alex Marion was there and Mike
8 Tuckman from Duke was there, and I think there's one other
9 from the industry; I can't remember the name.

10 MR. LIBERATORI: As an example, I think, just
11 recently we received a bill for the ACRS meeting on the PASS
12 elimination. I guess now, is that -- we were a little
13 surprised at that, but is that within the guidelines?

14 MR. DEMBECK: Well, the ACRS was given a couple of
15 tax to care for that. But, really, what happened there was
16 the invoice you received basically grouped everything
17 together. The ACRS part was eight hours and I believe that
18 will was over 5,000 dollars.

19 MR. DRAKE: Eleven thousand.

20 MR. DEMBECK: Eleven thousand. That's over 5,000.
21 So, the ACRS part of that was actually a small part. But,
22 I'm looking into that further and we'll get back to you on
23 that. But, it just --

24 MR. LIBERATORI: So, we should work with Steve?

25 MR. DEMBECK: Actually, every invoice sent to you
have has Ellen Poteat's name and number on the right-hand
corner of the invoice. You're, obviously, welcome to call
her, as the first step. You can deal with us, also,
whichever is most convenient to you.

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1 MR. SAM COLLINS: I'm not sure I understand the
2 message. Should we have billed for the ACRS, in that
3 manner?

4 MR. DEMBECK: It depends on -- I'd have to look
5 into what ACRS's role was.

6 MR. SAM COLLINS: ACRS is voluntary. They set
7 their own agenda.

8 MR. DEMBECK: Correct. My gut feeling is they
9 shouldn't be.

10 MR. SAM COLLINS: Right.

11 MR. DEMBECK: But, I'd have to see -- I'd have to
12 see why NRR gave them -- what the charge is here. I'm not
13 sure why we did that.

14 MR. SAM COLLINS: Okay. I think we have to go
15 careful with some of the initiatives we have internally that
16 are optional. I mean, there were normal processes, clearly.
17 That's part of overhead. But, when some of the processes
18 are optional, I think we have to understand some manner of
19 discipline. We're learning this all the time of how we deal
20 with those; so, clearly, put those on our plate, because
21 some of them may be transparent to us, until they come in
22 front.

23 MR. LIBERATORI: That's fine. We appreciate the
24 opportunity.

25 MR. DRAKE: Feedback on your meeting, I don't
think it was publicly noticed that same way it typically
was. I think the way it was publicly noticed, it kind of
buried a little bit. And the other thing, it conflicted
with the water reactor safety meeting, which was the exact

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1 same week, the exact same day. So, you had people that --

2 MR. SHERON: My question is do you think another
3 workshop, you know, that was, say, better noticed and a
4 little more, would that be worthwhile for you to have?

5 MR. DRAKE: Yeah.

6 MR. SHERON: All right. Let me take an action. I
7 will talk with our Division of Engineering, which sponsored
8 it, and what I may ask them to do would be to contact a lot
9 of the stakeholders and to see if they could come up with
10 maybe a mutual date and have another workshop on that.
11 Because, I think we're a little concerned that we didn't
12 have enough people there and we don't want to go forward
13 with this program and all of a sudden get a flood of letters
14 says, you know, what are you guys doing.

15 Another item I had was that -- and Sam said, you
16 know, we're starting with our work planning center, and one
17 of the things we're doing is, in our budgeting process, is
18 we're becoming very well -- I won't say "very," but more
19 sophisticated, okay, in the sense that we project a number
20 of licensing actions that we will receive in the course of
21 the year. And we set our goals and we have labor rates and
22 everything. We can, basically, go back and historically
23 look and say, how many staff hours does it take to process a
24 licensing action. Depending upon, for example, its
25 complexity, there can be easy ones, average ones, hard ones,
and each one has a various labor rate.

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And one of the things we just accomplished in the
past fiscal year was we actually met our goal of processing
over 1,700 -- 1,670 licensing actions. It's a fair amount

1 and we're getting out backlog down. But, as we do our
2 planning process, one of the things we've done is we've sent
3 out a letter in May -- I believe you all got one -- which
4 really asked, on a voluntary basis, if you could project how
5 many licensing actions each utility plans to submit in the
6 coming year and the coming two years, I believe it is.

7 The reason is that helps us in our planning, okay.
8 And I just got some feedback from the staff, to find out
9 where we were with that. And it was sort of a mixed
10 reaction, where some utilities were fairly responsive;
11 others, it was like, we don't know. And I think once we got
12 beyond one year, it was anybody's guess. And that may very
13 well be the case, okay; but, I would just kind of put out
14 that it's important to us for our planning and our
15 budgeting, okay, because what I worry about is that if we
16 don't have accurate estimates coming in from the licensees,
17 then we just have to take sort of a rule of thumb and say,
18 well, this is what we think it's going to be, based on a
19 number of factors, okay.

20 And I was worried that, for example, you know, if
21 we -- for example, this year, I think we're budgeting 1,500.
22 You know, and if I see, you know, 2,000 come in, okay, I
23 don't have the resources. And I don't want licensees to
24 come in and start screaming and saying, you know, we're off
25 getting our licensing actions processed, because Sam said,
you know, we've got license renewal. We've got to look for
resources for that. You know, so it's very tight budgeting,
you know, to the point where we're down to one or two FTE
almost.

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1 MR. BAILEY: Did you request that information from
2 the Owners Group or only to utilities?

3 MR. SHERON: To utilities. It went out to each
4 utility and it basically -- it goes out -- we try and send a
5 letter out every May, with something like a 60-day response
6 time, and that way it helps us in our next year budget. I'm
7 only bringing it up, because to emphasize the importance in
8 our process, okay. And I think in the long run, it helps
9 you, okay, because, then, we know better what we can -- what
10 services we can provide in our schedule.

11 MR. WALSH: It's Larry Walsh speaking. One of the
12 complications we're having in this issue is the deregulation
13 process, causing financial partner changes, which force
14 license amendments because of the financial situation. I
15 know our licensing manager, about 75 percent of his work is
16 tied up with new owners, just putting them on the docket as
17 being owners. And the technical work is beginning to slip
18 backwards, because we don't have -- the project manager just
19 can't handle the interface. It's just so many things going
20 on.

21 MR. SHERON: That's one of the areas. I'm not too
22 sure that we're all going to be subject to deregulation.

23 MR. SAM COLLINS: It's a different kind of work
24 load.

25 MR. SHERON: Yeah.

MR. LIBERATORI: But, I'd be glad to carry the
message back. And indirectly, it, also, affects our
collective WOG progress, as well.

MR. SHERON: I recognize you can't predict

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1 everything; but to the extent that you can really give us
2 some more -- you know, the most accurate estimate you can, I
3 think helps both organizations, both industry, as well as
4 the NRC, in the long term.

5 MR. SAM COLLINS: We're going to talk a little bit
6 about this at the regulatory information conference, when we
7 talk about our licensing issues that John Zwolinski is
8 focusing on. But, we're going down the path of measuring
9 these products and, of course, maintain safety is always
10 first. But, after that, we may very well ask the industry
11 to provide for outcome measures with these submittals, you
12 know, what is the reduction of burden; what is the schedule
13 for efficiency and effectiveness for the NRC to operate
14 with; is there stakeholder involvement -- those such of
15 things.

16 And, you know, I think there's a forum to discuss
17 that. And as a business, having eliminated the majority of
18 the backlog and being on a four-and-a-half to five-month
19 turnaround average now, I believe that there's a role,
20 whether it's at the CEO or the operating officer, the
21 license manager operator level, to say, you know, what is --
22 what are my expectations when I submit this licensing
23 amendment; is the licensing department measuring these the
24 same way the NRC is measuring these. Maintain safety is a
25 given. But, are we prioritizing our submittals to the NRC,
based on some common understanding, how the NRC prioritizes
its work. We need to discuss that. But, I think there is
room, everything else being equal, to maintain safety to be
predominant for looking at how much burden will this reduce

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1 and you want us to work on this much burden reduction or
2 this much burden reduction, and is that being focused on --
3 by the licensees, in the same way it's been focused on by
4 the NRC.

5 MR. SHERON: The last item I just had was on the
6 weather related NOADs. This is sort of my reaction from
7 last summer. Granted, we had kind of a strange summer with
8 the heat and everything, but were very concerned about, you
9 know, the fact that the grid was really being stretched and
10 we were concerned that, you know, plants were going to come
11 in with NOADs. We had staff standing by. We have some of
12 our projects people, it think, with beepers on and the like.

13 My question, when it all kind of settled down,
14 was, gee, you know, when I look at the NOADs that come in --
15 you know, our lake level is two feet below where it's
16 supposed to be in our tech spec or the ultimate heat sink
17 temperature went two degrees above where it was supposed to
18 be and the like, and, typically, they come in and there's
19 always an argument as to why the plant is still safe -- and
20 so I ask the staff, I said, well, gee, if the plant is still
21 safe, why are we yanking everybody's chain, not only the
22 licensees, but the staff, having people come in on weekends
23 and everything?1 And in our leisure, in the off season you
24 might say, you know, can't we request changes to tech specs,
25 such that we don't get into this business; that we know that
the plant is safe, even though that ultimate heat sink went
up three degrees? Can't we submit a tech spec change?

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And then maybe it's risk based, okay. I mean, I
understand that you may not be able to do a calculation, for

1 example, you know, that shows if everything is in its worst
2 condition, that you can still meet some licensing grace.
3 But, you know, in this risk-based, you know, environment
4 that we're really advocating, it may be possible to show
5 from a risk standpoint that you can go there, okay, because
6 other parameters may not be at some worse condition, all
7 right. But the whole idea was -- is to try and anticipate
8 where we think these weather related NOADs may go, you know,
9 and let's see what we can do to change the licenses, so that
10 we don't get into this crisis mode that we get into in the
11 middle of the summer and, you know, on Friday night, you
12 know, on July 4th, or something and the like.

13 So, I've kind of been asking the industry to take
14 a look at that and see if there's something we can do, you
15 know, to save, you know, from us going into the crisis mode
16 from both sides.

17 MR. LIBERATORI: We can certainly do that. My
18 personal recollection was we were there in the late '80s --
19 I'm trying to remember -- I think it was 1988, we had a very
20 hot summer and a lot of utilities were in exactly that
21 position then. And I know many of them, mine being one,
22 going back and reanalyzed in the off season, the ultimate
23 heat sink increases and put those in place. Now, I know,
24 personally, we haven't challenged the new limit we
25 established. But, if other utilities are starting to
challenge where they went, based on the last '80s, then
certainly they should look at it again. I'm just not in a
position to say right now, but we certainly can bring that
message back. You know, we may be there; we may be

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1 challenging what we thought was enough room then.

2 MR. SHERON: Plus, I see with the deregulated
3 environment, in the sense that I think that the reserves are
4 going way down and the like, so there's going to be a lot of
5 pressure to keep plants on line during these hot months and
6 everything.

7 MR. LIBERATORI: Typically, what will happen, too,
8 is that, you know, depending on where you are, it may change
9 with the tide, so, you know, you are in noncompliance and
10 then six hours later, you're in compliance. But, in the
11 meantime, you're taking action, because you are out of
12 compliance, and by the time you've done that, you're back in
13 compliance again. So, you can cycle the plant, as well.

14 MR. SHERON: So, I'm just saying is, you know, I'm
15 looking at this as something that may not go away, okay,
16 and, therefore, maybe we should start to think about how we
17 can address it, so we don't get into these last minute
18 efforts in the middle of the summer. That's all I have.

19 MR. SAM COLLINS: Maybe we can go around the table
20 and see if there are any other issues. Steve?

21 MR. DEMBECK: No. Ii have no more issues.

22 MR. TIM COLLINS: No more.

23 MR. SAM COLLINS: Any staff -- NRC staff issues?

24 [No response.]

25 MR. SAM COLLINS: Should we go over the items we
have?

MR. DRAKE: We talked about your resource
planning.

MR. SAM COLLINS: Yes.

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1 MR. DRAKE: I believe we had talked about, when we
2 submitted topical reports from the industry that were -- I
3 think you used the word "foundation-based issues," where --
4 you know, like our break open, it really doesn't need a lead
5 plant. It looks at the foundation of the break opening.
6 And is the resource planning process going to include some
7 allocation to deal with these foundation issues?

8 MR. SAM COLLINS: They are prioritized. We
9 determine them when we go through the rack up. Where they
10 stack up against the plant specific kind of depends on the
11 priorities. But, clearly, I think you budget so many
12 generic topical reviews per year.

13 MR. SHERON: Yeah. And, again, as part of the
14 planning process -- and it may be even worthwhile -- I don't
15 think we sent letters out to the Owners Groups. I think we
16 sent out letters to the individual utilities. It maybe
17 worthwhile when we send out letters, to send them out to the
18 Owners Group and ask to get a feel for what topicals, just
19 like, you know, are coming in. Because, we budget for so
20 many topicals and if we see more than what we budgeted for,
21 then, obviously we get the backlog and then we put them on
22 your list.

23 MR. SAM COLLINS: Ask you to prioritize them, too,
24 would be an input to that.

25 MR. SHERON: Yeah.

MR. BAILEY: We tried to do that, as part of this
meeting for the next year, but we haven't gone two years
out, I don't think, yet, and maybe we need to do some of the
work there.

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1 MR. SAM COLLINS: Yeah. Good. And, again, if it
2 appears like there's a difference of view or sensitivity,
3 then that's what these meetings are for.

4 Let me see, who has been keeping score? Steve,
5 you've been doing that?

6 MR. BLOOM: I was trying. It didn't seem like it
7 really -- the only one I found really was the one on GI-23
8 and WCAP. We have to figure how we're going to handle that
9 one in the future; how we're going to reopen that, take it
10 out of the hole. And I guess in doing so, we have to come
11 back with what they would want as a realistic goal; when
12 their SC would be one SC; how short term, long term we want
13 it, since it has been one of those that hasn't really had a
14 due date for a while.

15 MR. SAM COLLINS: Okay, I have a few here.

16 MR. DEMBECK: Check on the charges related to the
17 ACRS.

18 MR. BLOOM: Right.

19 MR. DRAKE: Brian is going to talk to Research
20 about 60 days.

21 MR. DEMBECK: Right.

22 MR. SHERON: And then we still got the IOU on the
23 containment sump issue, with regard to your -- I think that
24 was your action, actually.

25 MR. BAILEY: On the GDC-4 issue and whether we
wanted to ask for a rule change, that's in our court, to
come back and make a proposal, if that's what we think we
want.

MR. SHERON: But, I think the other question was,

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1 is that you had to comment that the NRC research program
2 that does not adequately --

3 MR. BAILEY: Right.

4 MR. SHERON: -- address PWR to regeneration.

5 MR. BAILEY: Right.

6 MR. DEMBECK: And I think Rob said he was going to
7 research that.

8 MR. JACOBS: That's in writing already.

9 MR. BLOOM: Right. So, Rob said he had to look at
10 your letter and see how to respond to that. So, he had to
11 go Research about getting a copy of that letter.

12 MR. DRAKE: We do have an action to get back to
13 you on the license renewal topical reports.

14 MR. SAM COLLINS: Right.

15 MR. LOUNSBURY: I did talk to John Craig. I have
16 been following this for the WOG, and one of the concerns
17 that I have, and I've expressed this to John, was not only
18 did the 105.41, the WCAP, there's a lot of other issues out
19 there relating to station blackout, plant specific
20 commitments, and other regulations that was waiting for this
21 thing to close. The question that I posed is, like, how are
22 you going to make sure that you're going to close the loop
23 on all of these other things that were linked to this
24 closure? They're not really sure what is really linked to
25 that closure. I mean, just -- you follow what I'm saying?
Just closing GSI-23 is that you've got them off the books.
There's a lot of commitments and a lot of regulations out
there waiting for this thing to close. I don't think they
have a very good accountability about what's involved after

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1 the close.

2 MR. BLOOM: Are you talking about other --

3 MR. LOUNSBURY: No, I'm not talking about -- I'm
4 talking about other regulations, other plant specific
5 commitments that were waiting for GSI-23 closure, before
6 they do things in station blackouts, etc.

7 MR. TIM COLLINS: Station blackout is explicitly
8 addressed in the GSA-23 closure. Now, as far as other
9 commitments, I don't know if there are other generic --
10 there are other specific regulations that have a hook on
11 GSI-23. Station blackout clearly had a hook on it, you
12 know. But, I don't know of other regulations, as a whole,
13 that have a hook on GSI-23.

14 MR. SHERON: Are you -- let me ask a question:
15 are you familiar with any of these?

16 MR. LOUNSBURY: The ones that I was -- obviously,
17 the station blackout. The other one was plant -- there may
18 be plant specific commitments that were waiting for GSI-23
19 closure; that they had to take some sort of action or not
20 action. And I'm not aware of any others, but I just really
21 ask the questions.

22 MR. SHERON: But the closure of 23, okay,
23 basically says there is no plant specific actions or generic
24 action. I mean, we already said there was no generic action
25 required. The closure, basically, says there is no plant
specific action that is being implemented, at this time,
based on the closure. So, I mean, from the standpoint that
there are some plants that have, you know, an open item that
says I've got to do something depending upon, they don't

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1 have to do anything. That's what I would -- that's how I
2 would interpret it. Don't call us; we'll call you.

3 MR. LOUNSBURY: But the point being is that there
4 were a lot of things that they -- this is early on in the
5 discussion, back in July, we started -- we were approached
6 by the NRC about helping them close GSI-23. There were
7 certain things that surfaced that was more linked to this,
8 than just closing GSI-23.

9 MR. SHERON: But part of the closure, though,
10 there's a follow-up action plan after the generic issue is
11 closed, but the Office of Research is continuing to do some
12 plant specific studies. Because, as part of the closure,
13 they had done some clarification of risk-related and some
14 other sequences, aside from station blackout --

15 MR. LOUNSBURY: Right.

16 MR. SHERON: -- loss of component cooling water.
17 And as a result of those analyses, the risks that they were
18 calculating were high enough to consider that we needed to
19 look at maybe some plant specific situations, to see if
20 there was a need for action. But, there is no specific
21 actions called out with the closeout of GSI-23, other than
22 to pursue some plant specific studies.

23 MR. TIM COLLINS: Right. Well, related with
24 GSI-23 closures is also GSI-9 and GSI-65.

25 MR. SHERON: Okay. I've drawn a blank on what 9
and 65 do.

MR. TIM COLLINS: Sixty-five specifically is the
component cooling water.

MR. SHERON: Okay. Component cooling water, there

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1 are follow up studies being done on component cooling water,
2 as far as -- the generic 23 is being closed and there's some
3 specific plans, which will be analysis for plant specific
4 vulnerabilities, relative to component cooling water. Okay,
5 so that's 65 -- that was 65 or 90.

6 Okay. And what is nine?

7 MR. TIM COLLINS: I can't remember off the top of
8 my head.

9 MR. LIBERATORI: I think the individual utilities
10 could deal with that.

11 MR. SAM COLLINS: I think what we may need to do a
12 sweep of the WISP system, to see if there's any pending
13 actions. But, clearly, I think in the way we disposition,
14 too, once we get through ACRS comments and all. As Brian
15 indicated, we'll send a message of whether we have further
16 expectations for plant specific actions. So, we just need
17 to take it under advisement on how we communicate.

18 MR. BAILEY: Sam, going back to the action item
19 for the license renewal topical, we have an action to --
20 after our meeting next week, to get to you with the dates we
21 need. But, I think as a joint action, we need to finalize
22 firm dates for issuing those topical together.

23 MR. SAM COLLINS: I agree with that. Yeah, I
24 think that's predicated on the needs for Turkey Point. But,
25 there may be a specific meeting between the driver, which I
think is going to be Turkey Point in this case, and the
license renewal staff to go over the schedule and then we'll
adjust that.

We had -- we just talked about the WCAP on the SER

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1 and the WCAP on RCPs, containment sump, risk-informed
2 approach guidance. I think we talked through that, right?

3 MR. TIM COLLINS: Right.

4 MR. SAM COLLINS: All right. LOCA analysis, I
5 think we're looking at a meeting early 2000 to review the
6 status. Is that what I heard?

7 MR. BAILEY: Yes.

8 MR. SAM COLLINS: The next action: AOV industry
9 initiative, I think we talked about industry initiative
10 versus commitment on that. And is that tied up in the --
11 how you take credit for industry initiatives? Are we that
12 far along yet, do you know?

13 MR. SHERON: For some reason, this -- I thought
14 the AOV was strictly an industry initiative. I mean, we
15 didn't have -- this was not something that I think the NRC
16 --

17 MR. BAILEY: Well, from our perspective,
18 initially, the NRC was looking at or thinking it may be a
19 generic issue.

20 MR. SHERON: Well, that was the AEOD studies on
21 it.

22 MR. BAILEY: So, we took the initiative to try to
23 get out in front of that.

24 MR. SAM COLLINS: Right. And then there was the
25 guidance that came through NEI, that NEI was going to give
to the industry and INPO weighed in there a little bit. We
indicated that we had comments on that guidance.

MR. SHERON: We sent those comments out.

MR. SAM COLLINS: Right. And so now, we need to

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1 get with Tom Scarborough and understand how we're going to
2 reconcile the industry initiative versus the NRC comments.
3 And are we still comfortable with the industry just
4 proceeding with their initiative? That, I think, is the
5 issue I took.

6 MR. SHERON: Yeah.

7 MR. SAM COLLINS: Okay. And we talked about the
8 additional workshop on voluntary industry initiatives.

9 MR. DRAKE: I guess the understanding is -- the
10 term "industry initiatives," in your context of voluntary
11 versus how we're using it, we don't -- I mean, the AOV
12 program document is a guidance document to our members, to
13 use as they see fit. It's not a voluntary initiative that
14 we're saying to the industry, we're doing this. We provided
15 them a reference document to use as they see fit.

16 MR. SAM COLLINS: Right.

17 MR. DRAKE: So, we don't see it falling into how
18 -- into your voluntary initiative bin, at least from our
19 perspective. You have to put it in that bin.

20 MR. SAM COLLINS: Well, I understand and your
21 point is correct from where you sit. From where we sit, we
22 say, what is the industry doing. Well, if they're following
23 Westinghouse Owners Group guidance or INPO guidance --
24 there's a lot of ways to get to the means to an end --- then
25 the staff has to understand that that guidance document
that's being used, whether it's an Owners Groups document
nor not, provides sufficient basis for the staff not to take
generic action. That's kind of how they cross over I guess.
Is that right, Brian?

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1 MR. SHERON: Uh-huh.

2 MR. SAM COLLINS: As I see it.

3 MR. BAILEY: Yeah, that was kind of the comment I
4 made early on, is what were your expectations on what you
5 thought the industry was doing with the document versus what
6 we're doing or not doing.

7 MR. SAM COLLINS: Right.

8 MR. BAILEY: That, I think, is the open end item
9 right here on AOVs, because I'm not sure we've gone far
10 enough to -- for you to decide to know exactly where we're
11 going yet.

12 MR. SAM COLLINS: Right. Okay. Any other topics?
13 Lou? Jack?

14 [No response.]

15 MR. SAM COLLINS: All right. Did we get to where
16 we needed to go?

17 MR. BAILEY: Yeah, that was a good discussion on a
18 number of items.

19 MR. SAM COLLINS: Okay. Very good. That closes
20 the meeting, then?

21 MR. BLOOM: That closes the meeting. Thank you,
22 very much.

23 MR. SAM COLLINS: Thank you.

24 [Whereupon, at 11:21 a.m., the meeting was
25 concluded.]

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